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Longcroft, R. Stoddart

Title:
The betting duty and its relation to bookmakers'...

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London

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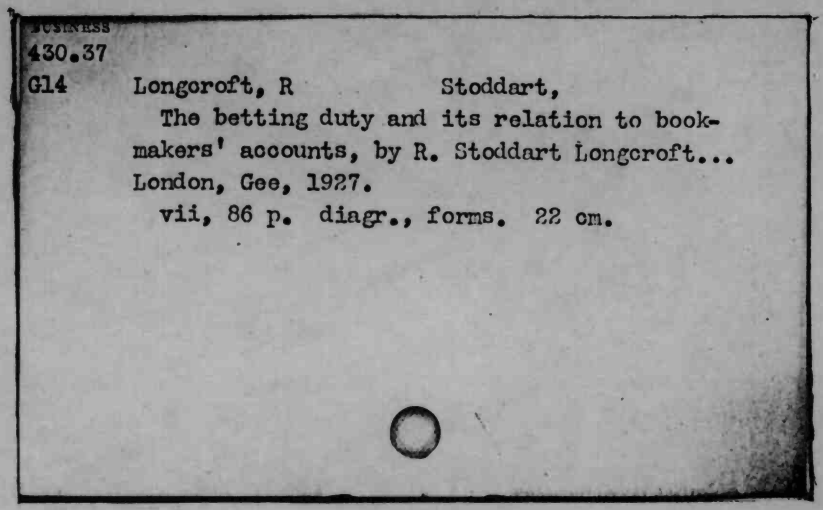

BUSINESS
430.37
G14 Longcroft, R Stoddart,
The betting duty and its relation to book-makers' accounts, by R. Stoddart Longcroft...
London, Gee, 1927.
vii, 86 p. diagr., forms. 22 cm.

RESTRICTIONS ON USE:

TECHNICAL MICROFORM DATA

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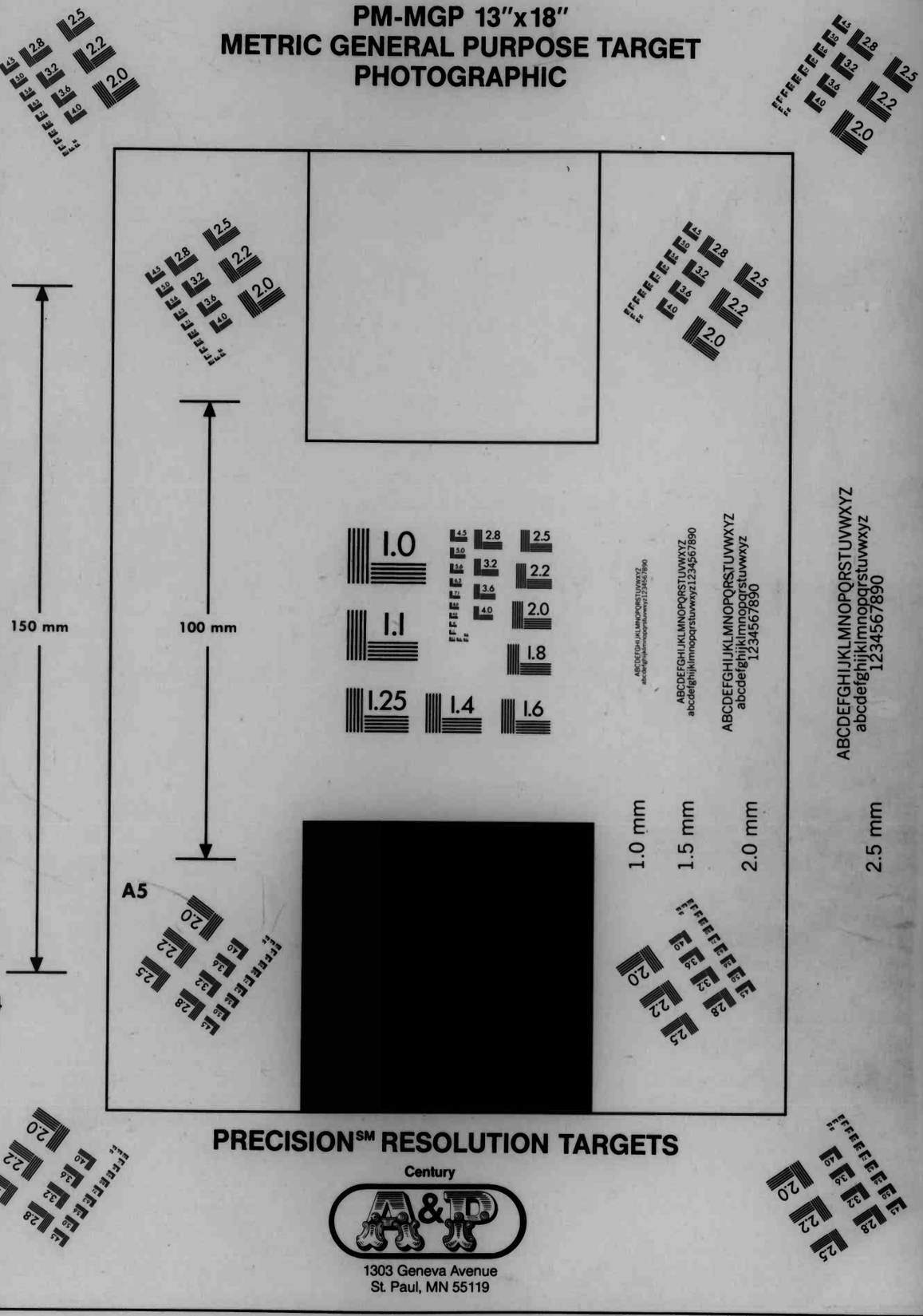

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THE BETTING DUTY

and its relation to

BOOKMAKERS' ACCOUNTS

THE BETTING DUTY

and its relation to

BOOKMAKERS' ACCOUNTS

BY

R. STODDART LONGCROFT, A.C.A.

FOR REVIEW.

The publishers would be glad to have a copy of the issue containing a notice.

LONDON

GEE & CO. (PUBLISHERS) LTD.

KIRBY STREET

1927

Mint.
27.24915

D 430.37
G14

PRINTED IN GREAT BRITAIN

Mar. 23. a.s.p.

PREFACE

The Finance Act, 1926, which brings into being "The Betting Duty," has placed the bookmaker in the matter of the collection of that duty in a fiduciary position to the Inland Revenue authorities.

The onus of collecting and paying over the duty is upon the bookmaker and failure to perform the services demanded of him involves heavy penalties.

Without an adequate and systematic record of his transactions, the bookmaker runs grave risk of incurring not only the imposition of penalties but also of disqualification from holding the certificates without which he may not continue in business.

To indicate the dangers and to assist the bookmaker and the professional accountant, to whom he will turn for guidance, is the object of this little book.

R. STODDART LONGCROFT.

6 Broad Street Place, E.C.2.
December 1926.

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PART I

BOOKMAKERS' ACCOUNTS

The Finance Act, 1926, in the provisions relating to the duty on betting has directed attention to the accounts of bookmakers.

There are several references in the Act and in the explanatory regulations issued by the Commissioners of Customs and Excise to the particulars which are required to be incorporated in the bookmaker's accounts. These particulars have been insisted upon so that the Treasury may secure adequate control over the collection of the duty, by way of the bookmaker himself.

The aim of the Commissioners has been directed toward making the bookmaker the agent and trustee of the Revenue authorities, much in the same way as the collection of tax at source, in the case of income-tax, places the payer in the position of trustee for the tax deducted from payments made. In the latter case the tax is usually paid over to the authorities after its collection, but in the case of betting duty the result of the working of the collection machinery enforces in many cases payment over of the duty before collection has been made (or duty extracted) from the backer.

The comments which have appeared in the Press and elsewhere leave one in no doubt as to the feeling of bookmakers on their involuntary appointment as agents to the Crown. But the time for lamentation is now gone and the bookmaker

has to reconcile himself to the fact that, as escape from these onerous duties is impossible, their performance must be rendered as innocuous and troubleless as may be. To ease himself of his burden the bookmaker will turn and is turning to the accountant for guidance. To make that guidance as effective and trustworthy as possible and to give the bookmaker a handy work of reference on his new duties is the object of this book.

Bookmaking Transactions

Since most people have at some time made a bet, it is unnecessary to deal fully with the question of "odds." The "odds" or price are the result of supply and demand of accommodation for backing a horse, a dog or any other of the many objects and enterprises upon which bets can be made. The supplier of accommodation is of course the bookmaker, who, in his capacity as genie of the bank of fancy, declares at what rate he is prepared to give the accommodation sought.

Apart from any particular risk the bookmaker may be prepared to accept, his transactions are wholly dependent upon the laws of supply and demand. For instance, a horse starts at the "price" of 100 to 8 (i.e. £8, or a multiple of £8, must be staked to win £100 or a multiple thereof) and the demand for accommodation at that price grows; the bookmaker, limiting his risks, "shortens" or increases his price, so that, whereas at one time he was prepared to accept 100 to 8 "against," owing to demand, the price may ultimately be shortened to 6 to 4 "on," i.e. £6 must be staked to win £4.

The foregoing illustration expresses in essence all that the accountant need know of the "laying

of odds." But since an understanding of some of the terms used in bookmaking may help the accountant in his work, the following list is given as an explanation of the bets and terms most frequently encountered. It must be remembered that all such bets are limited to one condition, the law of supply and demand—it is only the conditions which vary, and only in the case of outstanding liabilities and the "carry over" from one book to another need "fancy bets" with their varying conditions cause consideration.

To Win.—Odds paid only if horse wins.

Each Way.—Two transactions on same horse: first, as above; second, if horse is within the first three home (if eight or more runners), one quarter the odds paid; or if horse is second home (if six or seven runners), one third of the odds paid.

Double.—Bet on two horses: odds paid if both horses win.

Accumulators.—Bet on two horses: money won on first horse forms the stake for the second event.

Odds On.—Description of price, as 4 to 1 on, viz. £4 staked to win £1.

Odds Against.—Description of price, as 6 to 4 against, viz. £4 staked to win £6.

Other kinds of bets can best be understood by obtaining a firm's book of rules.

So much for the bets made with a bookmaker by his clients. It is now necessary to examine the bets made by a bookmaker on his own account.

There are occasions when despite "shortening" of price the clients of a bookmaker still demand

accommodation. Financial prudence points toward his refusing the commissions, but to refuse may endanger further business. He therefore accepts the bets but, instead of keeping the money staked, makes bets to a similar amount with another bookmaker. The object of this transaction is to safeguard against loss, since if the horse which is the subject of the transaction wins, the bookmaker draws his winnings to pay his losses and thus keeps within the margin of risk upon which to build his profits.

This operation of limiting losses is known as "hedging" and, as a transaction apart from the general public, has been made the subject of an exception to betting duty. (Section 16 (1) (*d*), Finance Act, 1926.)

Hedging may take several forms, an instance of which may be found in the case of a race like the "Derby," in connection with which is run the well-known Calcutta Sweepstake. In this case the bookmaker sometimes transacts his hedging operation not with another bookmaker but with the proprietor of the "ticket" which has drawn the favourite. The operation here is simple: the proprietor of the ticket wants to make sure of a good round sum of money and is therefore prepared to sell a half share in the ticket. This means that should the horse lose, the proprietor of the ticket will benefit to the extent of the share sold to the bookmaker, while the fact that the horse has lost only means that the bokmaker is out of pocket by the amount paid for his share, which will certainly have cost him less as a hedging transaction than "laying off" in the more orthodox manner.

The Books of Account

Bookmakers' accounts divide themselves into two classes—cash and credit. In the former case, apart from "the Book" the only book of account found is the Pass Book and even that is sometimes not in evidence. But it is unlikely that the professional accountant will be called upon to deal with accounts of that description, except where the bookmaker runs both a credit business and a cash business on the course. It will therefore only be necessary to consider the accounts of bookmakers whose transactions involve no personal contact between layer and backer but are effected by means of debit and credit entries to a personal account.

The Book—Credit Transactions

Before each race bookmakers "open a book" in which they record all bets made with them and which is, in effect, a statement of all their liabilities and commitments to their clients on the race. "The book" is a kind of day book and varies in form according to the requirements of the business, but, however amplified, must contain in accordance with Paragraph 2, Supplementary Notice No. 128, the following particulars:—

(1) The date of the bet.

(2) Its amount.

(3) The condition attaching to it (e.g. "double," "each way," &c.).

(4) The rate of duty in the case of a horse race (i.e. whether 2 per cent. or 3½ per cent.).

(5) The number of the Revenue Ticket issued (or in cases where tickets are not used, sufficient particulars to identify each bet).

The odds cannot be entered at the time the commission is taken in the case of starting-price men (i.e. bookmakers running their business by means of accounts worked on a starting price basis), but are placed against the bet after the race, the starting price being ascertained from "the tape" or from the *Sporting Life* the following morning. Where the transaction is not on a starting price basis, as where a price is obtained some months before the race, a slip is usually given recording the transaction, a duplicate of which is retained by the bookmaker and can be seen.

As previously stated, each business favours a different kind of book, but a ruling which incorporates the provisions of the Act and can easily be modified or amplified to particular requirements might be as follows :—

.....Meeting.....

Date of Bet	Time Taken	Instructions P. T. L.	Name	Revenue Ticket Number	Stake	Conditions
	h. m.				£ s d	
2/11/26	12 10	P.	JANIS		1 0 0	EACH WAY
Do.	12 12	T.	ZANY		1 0 0	WIN
Do.	12 15	P.	ROCK		1 0 0	ARGUS

the.....1926

A	B	C	D	E	F	Fo.	Debit	Credit	Remarks
£ s d	£ s d	£ s d	£ s d	£ s d	£ s d		£ s d	£ s d	
2 0 0									
	1 0 0								
		1 0 0							

In the above example it has been assumed that weekly returns are being made and therefore the column for Revenue Ticket Number can be omitted.

Columns A, B, C, D, E, and F are for the money staked on each horse and, apart from showing amounts staked, are useful in preparing the weekly abstract of bets, necessitated by Paragraph 11 of Supplementary Notice No. 128.

In the case of bets made with conditions such as "each way" or "double" the stake will be shown in columns A to F, &c., only during the week in which the transaction first arose. The carry forward in the case of a "double" will appear on the sheet to which it relates, being shown in coloured ink so that it can be excluded for the purpose of the subsequent weekly return. For instance, the above example shows that there is a "double" on ARGUS and horse "C." "C" is running first and the duty on the stake will be paid in the return for the week ended 5/11/1926. If the "double" goes forward, "C" having won, the stake will be shown in coloured ink on the sheet of the meeting in which ARGUS is engaged.

As to whether a bet incorporating a condition such as each way, double or accumulator should attract duty, only at the time the bet is entered into, or throughout the operations which form the transaction, reference should be made to Supplementary Notice No. 131, which lays down the rules in each case and gives examples.

At present the inclination of the starting-price men is to arrange with their clients to charge them with duty upon winnings plus winning stakes and to bear the duty themselves upon the losing side of the account. Whether this scheme will continue

in being remains to be seen, but at the moment one is only concerned with the provision for this contingency in the books of account. If, therefore, the clients agree to this arrangement, it will be necessary to extend the ruling of the book by two additional columns for bringing into account the duty. The extra columns will probably make the record of the duty easier than if the deduction is made in the main debit column.

That part of the book, which relates solely to the record of bookmaking transactions as such, has been excluded, since each bookmaker has his own ideas on that subject, which is not material from the point of view of accounting.

The Audit

Audits of bookmaking transactions are of two classes :—

(1) Sole proprietor or partnership businesses.

(2) Limited companies.

Each class presents its special points of interest.

Where there is a sole proprietor or the business is being run with one or more partners, more personal supervision is usually evident, thus aiding the auditor by providing a system of internal check (over the receiving clerks, &c.) upon which reliance can in proper circumstances be placed. Again, since many transactions are from their nature difficult to vouch, the scope of the audit can be limited to the work performed.

No such limitation is possible in the case of a limited company and the auditor must not be afraid of reporting fully on points which he has found difficulty in verifying. In many cases it will no doubt be necessary to obtain certificates of

verification from the Board, for without them it is difficult to see how a " clean " report can be given.

" *Internal Check* "

Most businesses incorporate some system of " internal check." Such a system not only guards against clerical error but also, by making collusion between two or more employees necessary to any fraudulent operation, decreases the likelihood of loss to the employer by defalcation and embezzlement. In no business is " internal check " more necessary than in that of a bookmaker and without it the possibilities for fraud on the part of clerks cannot be exaggerated.

In one office, where the control was lax, it was found that one of the receiving clerks had been taking commissions from a confederate *a few minutes after the race.*

In another case, where the business was under the control of a manager, it was noticed that the amount written off for bad debts had during a period considerably increased. On investigation, it was discovered that cheques sent by clients in settlement of the losing side of the account had been misappropriated by the manager, who, to cover his operations, had been writing off the amounts which still stood as unpaid. Further commissions coming from the clients whose accounts had been manipulated were refused, the client being informed that his account had been closed.

It is comparatively easy, too, if no proper system of check is in force, for the manager, if he be so minded, to keep clients' losses and to charge winnings.

Possibilities of fraud in this connection might be continued almost indefinitely, but the weak spot

will be apparent to any professional accountant as soon as he comes to review the system before him and further examples are perhaps unnecessary. It will be evident, however, that a proper system of control in these matters is of first importance in any well-arranged business.

In the same way that the accountant will immediately see the danger points of the business, so also will the remedy in the particular case at once be apparent. It is not, however, always easy to disturb a system which has been instituted by the bookmaker himself and has been worked by him for a long period to his complete satisfaction. But a recital of some of the dangers which may lurk in a loose control has usually had the effect of bringing the desired change.

The question now arises as to the means by which some of the loopholes of fraud can be closed.

Commissions.

Take first the actual receiving of the commission.

In a credit business there are three channels through which commissions come, as follow :—

1. Letters.
2. Telegrams.
3. Telephone.

1. The first is not a difficult matter to control. The post as it comes in should be opened in the presence and under the control of a responsible official. If possible neither the official, if he be a manager, nor the clerks opening the letters should have anything to do with the books of account. It is usual for commissions to be sorted from the rest of the correspondence and either tabulated then or passed up to the department that controls the " book."

2. Telegrams are usually " coded " with the dual object of saving expense in transmission and ensuring secrecy. " Decoding " is a simple matter as the code consists of only a few terms which are well known to the staff. The procedure is much the same as with letter commissions.

3. Telephone commissions most frequently form the bulk of the business and the system of recording needs careful examination.

According to the size of the business, the number of receiving clerks may be from one to twelve or more. Since, however, the bigger the business the more complex the system, it will perhaps make for clearness if the case of a business employing three receiving clerks be considered.

Every office has its own features, but broadly the system works in the following manner.

Calls as they come through are divided between the receiving clerks, who on a sheet before them record the following :—

Time of Bet	Name	Meeting	Horse	Stake	Conditions

Sometimes the record is made on numbered slips with a duplicate carbon underneath. The slips are then sent along to the " book." The vital consideration in recording bets is to get the commissions before the " book " department as soon as possible.

An instance of a fraud practised by a receiving clerk has already been given. To guard against

such an operation it is necessary to see that, as soon as the "tape" intimates that the race has started, no more bets come through on that race. This can be done either by cutting off the clerks from their instruments, all commissions on that or other races being dealt with for the time being by another department, or by personal inspection by a principal or responsible official, who should initial the sheet or the last numbered slip.

Money received.

To guard against misappropriation of money received, the precautions necessary in all businesses are called for.

At the time the commissions are sorted out from the general correspondence, the letters enclosing money will also be separated. In this connection a point may be noted. Some bookmakers request their clients in settling accounts to address their letters to the "Accountant" or the "Cashier," some even supplying envelopes with addresses printed in that manner. The idea is good since it enables closer watch being made over the cash received and also saves time.

Amounts received will consist of Bank of England and Treasury Notes, Money Orders, Postal Orders and Cheques.

Clerks opening letters should enter the cash article received on a summary containing a heading for each description, e.g. Bank Notes, Treasury Notes, Cash, &c. If a letter is sent with the money, the letter should be marked in a corner as follows:—Cheque £7 18s. 4d., or P.O. 18s. 6d. Where, as is often the case, the envelope contains only a cheque, it is a good plan to enter the name and amount on the envelope.

In one large office there is a system whereby the whole of the letters containing cash pass directly before a responsible official who watches a clerk extract each cash article. As the letters are opened the opening clerk calls out the amount received which is recorded by another clerk on an adding machine, thus providing an original cash record which, from the point of view of internal check, is invaluable. Of course, a system such as this aims at perfection and can only be instituted in the largest of offices; but it has been given as showing what importance attaches to a proper system of check.

The clerks' summaries will be passed to the cashier, who will reconcile the cash received with the summaries. The letters marked as indicated will be forwarded to the ledger department for posting.

The total of the transactions for the day, as shown by the accounting department, should then be reconciled with the amount shown as received by the cashier's department. In addition to the daily cash agreement, a profit and loss reconciliation should be prepared of total daily profit and loss and the sum of clients' individual transactions, which should of course agree.

There are no doubt many offices where owing to staff requirements a system as elaborate as that given above will be impossible. But if the idea be borne in mind that clerks receiving cash should not be engaged in the accounting department, there will be little likelihood of manipulation.

Money paid.

Since the paying away of money is equally as important as its receipt, attention must now be given to money paid.

In all properly-controlled businesses it is a rule that "all payments must be by cheque" and, of course, in the case of a bookmaking business, the rule is not less important. But it has happened that the clerk who prepares the cheques for signature has wrongfully inserted a payment either to himself or to a confederate. To guard against this kind of fraud is not difficult.

The racing week runs from Saturday to Friday inclusive, cheques being sent in settlement of the balance either way the following Monday or Tuesday morning. It is therefore simple to ascertain the result to the bookmaker of the week's transactions; and for payments to clients and hedges there should be prepared a summary of all amounts due, which should agree in total with the losing side of the book. If the summary be referred to for all cheques drawn for signature, fraudulent insertion of a cheque will not happen.

The use of percentages.

Accountants well know the uses of percentages and in a bookmaking business they can often be made to form a useful check.

Each business differs slightly, but as a rule if a bookmaker makes between 2½ per cent. and 3 per cent. on turnover he is well satisfied. Percentage on turnover therefore is a useful indication as to whether the business is being run properly and any variation should be investigated.

Vouching

It has been previously stated that the auditor should not be shy of obtaining certificates for those portions of the detail which he has been unable to verify. This will particularly apply to firms carrying on both a cash and credit business.

It has been almost impossible in the past to verify satisfactorily the transactions on the course and the fact that Paragraph 2 of Supplementary Notice No. 128 lays down certain particulars which must appear in every "book" will probably not materially assist the auditor.

For cash payments as a rule only endorsed cheques can be seen, which are sufficient if the personal accounts are closely watched.

Cash receipts similarly should be tested with the accounts.

Transactions on the book can be tested with the price given by the *Sporting Life*.

Occasionally deposit accounts are found. From the point of view of the bookmaker they are excellent, by way of limiting his bad debts, but few clients are willing to run their racing accounts in this way and there is in addition no doubt but that the method is illegal, since a deposit is cash and cash can only be staked on the course. Deposit accounts, when found, will present no little difficulty to the auditor since their creation is usually by way of contra cheques.

A firm of bookmakers usually estimate that of their debts outstanding at any time, 20 per cent. are bad and irrecoverable. Care must be taken in scrutinising the racing accounts to see that no further transactions have gone through an account when once a debt has been written off.

A point which often gives pause for thought when first encountered is where, for example, a double has been accepted and one horse has won, but the race in which the other is engaged has not at the date of the balance sheet been decided. There may or may not be a liability. How is it

to be recorded ? It has been argued that a reserve should be made against the liability to the extent of the amount required to "lay off" the bet. But, in practice, unless a considerable space of time separates the events, the bet has usually been determined prior to the preparation of the balance sheet and the liability can therefore be estimated exactly. Otherwise it is probably better to show the item on the face of the balance sheet as a contingent liability.

Audit Programme of Main Points

It is of course impossible to lay down the work to be performed in every audit, but the following programme has been given as a guide to the more usual requirements.

Ascertain system of internal check.

Obtain firm's book of rules. (Regard must be had to the rules of the firm since there are frequently conditions attaching to clients' racing accounts which the auditor should know.)

Cash Book.

Credit side.

Cast.

Vouch betting payments with endorsed cheques and Ledger Accounts.

Vouch other payments with endorsed cheques and statements or receipts.

Check postings to Ledger.

Check with Pass Book.

Debit side.

Vouch with accounts.

Check with Pass Book.

Check postings to Ledger.

Prepare Bank reconciliation statement.

Obtain Bank certificate.

The Book.

Check casts.

Test calculations and extensions.

Test prices with *Sporting Life* or duplicate tickets.

Check postings to Personal Accounts.

Check postings to Impersonal Accounts.

The Ledger(s).

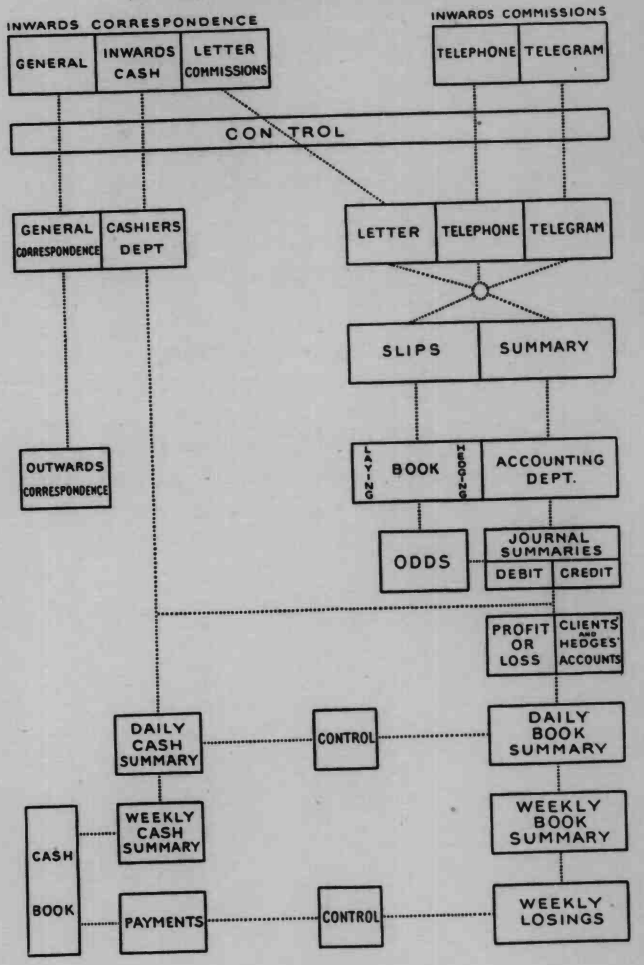
Check postings from the "Book."

Extract balances (and agree with Control Account, if in use).

Scrutinise for Bad and Doubtful Debts.

Examine and report on all debts written off.

DIAGRAM OF INTERNAL CHECK
(Showing (in dotted lines) the flow of work)



PART II

BETTING DUTY

The duty on betting is governed by Sections 15 to 18 of the Finance Act, 1926. The operation of the duty is explained and amplified by five notices published by the Commissioners of Customs and Excise, known as Preliminary Notice No. 126, dated 6th August 1926, and Supplementary Notices Nos. 128, 129, 130 and 131, dated the 6th and 11th October and the 4th and 11th November 1926 respectively.

By Section 15 (1) (*a*) of the Act, on every bet made after 1st November 1926 there must be paid duty as follows:—

> "3½ per cent. of the amount paid or offered, or promised to be paid to, or to the order or for the use of, the bookmaker."
>
> "2 per cent. (of the amount paid or offered) in the case of a bet in respect of a horse race made on any ground used for the purpose of a racecourse for racing with horses, or on any ground adjacent thereto, on a day on which horse racing takes place thereon, and made with a bookmaker attending at that ground by a person so attending."

Thus 3½ per cent. has to be paid in respect of all credit bets and 2 per cent. for bets made in cash on the course.

The concession in respect of duty on bets made between persons on the course arose through

representations being made to the Chancellor of the Exchequer that, since persons attending race meetings had already paid Entertainment Tax in gaining admission, some relief ought to be afforded them or the attendance at race meetings would decrease and in consequence the important industry of British blood stock breeding would suffer.

As occasionally bets will be found which do not relate to horse racing it must be observed that by Section 18 (1) "the expression 'bet' means a bet on an event of any kind" and therefore, whether these bets are of a cash or credit nature, the duty will be 3½ per cent., since the lower duty only applies to racecourses where horses are engaged.

If bets are received by a bookmaker on the course from a person not attending the meeting, duty will be at the 3½ per cent. rate. It is an offence to issue a ticket at the lower rate where the higher rate applies, or to issue a ticket for an amount less than the amount of the bet.

Thus, when a meeting is held, where, say, horse and foot racing is combined, it will be necessary for bookmakers to use tickets or make returns at two different rates in respect of the same meeting. The bets on horses will be taxed at 2 per cent., while those on foot racing will have to bear the 3½ per cent. rate. Bets on motor car races are also to be taxed at 3½ per cent., but there is some reason to suppose that ultimately the duty on events of this kind will attract the lower rate. This, of course, has nothing to do with "horsepower."

There is nothing in the Act relating to private bets, i.e. bets made between two persons, neither of whom carries on the business of a bookmaker. The Act by Section 18 defines a bookmaker as

follows:—" . . . any person who, whether on his own account or as servant or agent to any other person, carries on, whether occasionally or regularly, the business of receiving or negotiating bets, or who in any manner holds himself out or permits himself to be held out in any manner as a person who receives or negotiates bets." And an interesting point arises as to whether the Crown can bring an action for the recovery of duty on such a bet, since, although neither party to the transaction is in fact a bookmaker, yet the Act in this section provides for the "occasional" negotiation of a bet, which by the same section is made to include "a bet on an event of any kind." Further, if the negotiating of bets is the hall-mark of a *bona fide* bookmaker, which of the parties is liable for the duty, and will the appropriate penalties set out in Section 17 be enforceable?

The question of private bets is specially applicable to clubs, where such transactions are common.

The Chancellor of the Exchequer in the House of Commons said definitely that such bets were not dutiable, but the Customs authorities incline to the opinion that they are. Before long, no doubt, there will be a test case to decide the point.

Payment of Duty

The duty can be paid either by Revenue Ticket or by Weekly Returns.

Section 15 (3) provides that "betting duty shall be payable by the bookmaker with whom the bet is made, and every bookmaker . . . with whom a bet is made shall immediately on the making of the bet issue to the person by whom the bet is made a ticket (not before used) in the prescribed form denoting that the proper betting duty has been paid."

The onus of paying the duty is therefore upon the bookmaker and the payment must be (subject to the following exception) "in the prescribed form," which is by way of "a revenue ticket," given at the time the bet is made.

Except in the case of bookmakers who have no time or inclination to prepare the weekly returns and deposit security, it seems probable that Revenue tickets will not be largely used, since the same section provides that "a bookmaker (can make) an arrangement approved by the Commissioners for furnishing returns of all bets made with him and (can give) security up to an amount and in a manner approved by the Commissioners (of Customs and Excise) for the payment of the betting duty thereon."

It is, however, necessary to observe that by Paragraph 1 of Supplementary Notice No. 128 "no bookmaker will be allowed to use both methods concurrently."

Revenue tickets.

Where tickets are used for payment of duty, application for their purchase must be made either personally or by post to the Collector of Customs and Excise, Betting Duty Branch, Customs House, London, E.C.3, or to the local Collector of Customs and Excise.

Tickets are issued in bundles of 50, representing the various values of the bets at the different rates. The action of tearing the ticket out of the book automatically defaces the ticket. (Paragraph 10, No. 126.)

Arrangements have been made for the refund of duty in respect of unused or spoiled Revenue tickets.

The relative provisions are contained in Paragraphs 8 to 11 of Supplementary Notice No. 130 as follows:—

1. Application for allowance should be made, either to—

   (*a*) Collectors of Customs and Excise—personally—or to

   (*b*) Accountant and Comptroller-General, Betting Duty Branch, Custom House, E.C.3—by post.

2. Forms of declaration and claim may be obtained from either of the above.

3. No allowance is made for:—

   (*a*) Lost tickets.

   (*b*) Mutilated tickets.

   (*c*) Tickets torn from the book.

   (*d*) Tickets not purchased within two years prior to application.

4. Allowance is made for tickets spoilt inadvertently.

All Revenue tickets must be issued in strict numerical order and immediately on the making of the bet an appropriate number of tickets must be torn out. In the case of an office bookmaker using Revenue tickets, the portion torn out must be sent by post (Paragraph 7, No. 128). "Such portion should normally be despatched on the day on which the bet is made. But as a temporary concession to meet the case of bookmakers who may experience difficulties in the early days of the duty in making arrangements to ensure that all the detached portions are posted daily, bookmakers will be allowed to post the detached portions at convenient intervals, provided that no portion

is posted later than the date on which the relative weekly account is despatched to the backer."

A bookmaker using Revenue tickets must not use any other kind of ticket in respect of bets made with him, nor must he mark the face of the ticket in any way, but, if he chooses, he can have printed by rubber stamp or otherwise his name and any particulars upon the reverse side of the ticket which is blank. By making application, bookmakers can have their tickets printed on the reverse side with required particulars upon payment of the cost of printing.

Where a Revenue ticket has been issued in respect of a bet coming under any of the headings of point 4 on page 27, repayment of the duty can be claimed on Form B.D. 22. If possible the ticket should be forwarded when the claim is made.

There will usually be emergency stocks of tickets which can be drawn on at the principal race meetings, but it must be remembered that, should the supply of tickets become exhausted, the only course open to the bookmaker will be to close his "Book." Reliance should not therefore be placed upon the stocks available at the meeting.

Weekly returns.

Without doubt the majority of bookmakers will adopt the weekly return system for the payment of the duty.

Bookmakers wishing to enter into such an arrangement must apply to the Secretary, Customs House, E.C.3, on Form B.D. No. 10, which may be obtained from the above address.

Before the application is granted the bookmaker will be required to enter into a bond for the payment of the duty. The bond must be signed by the

bookmaker as principal and also by a surety, who may be an individual (in the case of large bonds, two individual sureties may be required, a bank or a Guarantee Society), Paragraph 13, No. 128.

The amount for which the bond must be entered into has been fixed at a sum not less than the estimated duty for a period of four weeks, on the basis of the maximum amount received in bets in any period of four consecutive weeks during the past year.

It is not necessary for the bookmaker to obtain personal sureties or the services of a Guarantee Society and, if he so desires, he can arrange with his bank to act as surety by depositing with them cash or securities to cover the required amount.

If, by the time the bookmaker desires to pay on weekly return, arrangements for a bond have not been completed, the Commissioners are willing, pending completion, to accept a deposit of cash which will be forfeited in the event of failure to pay duty or comply with the conditions of the Commissioners.

A formal letter of approval will be issued when the weekly return arrangement has been sanctioned, which must be produced on demand to any authorised officer and must be returned to the Commissioners on the termination of the arrangement. By Section 18 "the expression 'officer' means an officer of Customs and Excise, and includes any person expressly authorised by the Commissioners to perform the duties of an officer of Customs and Excise." In the performance of his duty an officer of Customs and Excise must produce his authority, if called upon to do so.

In addition to the particulars required to be shown on his "book" by Paragraph 2, No. 128 (*see* page 5), a bookmaker by Paragraph 11, No. 128, must keep in a special book an abstract of the bets made in each week ending Friday, either by reference to events, or by reference to individual accounts, whichever may be the more convenient. This paragraph is introduced to facilitate the collation of figures and recognises the fact that bookmakers vary in the method in which they keep their accounts.

The return (B.D., No. 11) must show the total amount of bets received during each week ending Friday at the 2 per cent. and the 3½ per cent. rates of duty respectively. Except at mixed meetings and in the case of firms doing a credit business and a cash business on the course all the bets will be at one rate.

Returns must be sent in not later than the Wednesday following the week to which the returns refer, and accompanied by a remittance for the amount of duty due, to the address of the collector named for this purpose at the time the weekly return arrangement is entered into.

Bookmakers operating on the course can pay duty on weekly returns. And although a bookmaker must either use tickets or make returns, he can, *if he is making returns*, use *personal* tickets.

Form B.D., No. 11, provides for laid off bets, void bets, non-starters, temporary cessation of business, &c.

The Weekly Return Form.

With regard to the weekly return the following points should be noted in addition to those already mentioned :—

1. The return must be certified by the bookmaker himself or "by a person authorised by him to certify it." No doubt in many cases the "person authorised" will be the bookmaker's professional accountant.

2. If no bets have been made with a bookmaker during the week he must furnish a "Nil" return except if written notice is given as under 5.

3. Where a bet is made with a condition that the winnings become stakes on another event or events the amount of the stakes on each event must be treated as separate bets and included in the return.

4. Bets need not be included in the return in respect of :—

(*a*) Bets received on a meeting which is (or a part of which is) abandoned.

(*b*) Bets received on a "non-starter" except where the amount is retainable by or payable to the bookmaker as in the case of "all-in" bets.

(*c*) Place bets which do not materialise.

(*d*) Bets where the nominator of the horse dies.

5. A bookmaker must give immediate written notice to the Commissioners in the following circumstances :—

(*a*) Where he intends to cease business temporarily for a period, specifying the date as from which business will cease.

(*b*) Of the date when he intends to recommence business.

(*c*) On taking in a partner or partners.

(*d*) On assignment, agreement, death of a partner, or in any other matter concerning the constitution of the partnership or business.

6. A change in proprietorship does not of itself terminate the weekly return arrangement nor free the pre-change proprietor from liability in respect thereof.

7. The written consent of the Commissioners must be obtained prior to the termination of the weekly return arrangement.

8. The authority issued to the bookmaker must be returned to the Commissioners on the termination of the arrangement.

If duty has been paid on bets coming under any of the headings of point 4 claim to repayment must be made on Form B.D. 22.

Effect of Duty on Books of Account

Some indication has already been given as to the manner in which the new duty will call for the amplification of the books of account and there is no doubt that a good deal of extra work will devolve upon the bookmaker in this connection.

Paragraph 9, No. 126, lays down that "the bookmaker will be required to keep proper books and records for official inspection" and "the amount of duty payable will be calculated by reference to such returns and records." "Proper books" will no doubt be construed as meaning such books as show readily the total transactions and the amount of duty which they attract. Apart altogether from the penalties involved which will be dealt with later, a failure to send in correct returns through a faulty system of accounts may, by the official practice of assessing arbitrarily in doubtful cases, cost the bookmaker more than he normally would have paid.

In cases where there is some doubt as to the returns the Commissioners will rely on Section 16

(1) (*c*) which runs as follows:—"The Commissioners may make regulations for requiring the production by bookmakers of their certificates (i.e. personal, entry and weekly return) and of any books, accounts, vouchers, Revenue tickets or other documents relating to the business carried on by them as such, and for authorising any officer to examine and take copies of or extracts from any such documents." This section has been explained by Paragraph 17, No. 128, which requires that "a bookmaker must keep every book, account voucher, counterfoil of Revenue ticket and other document relating to his business for a period of six months and they must be produced for inspection, if and when required, to any authorised officer."

In the past it has been found that bookmakers from the point of view of accounting record do not keep distinct "hedging" from ordinary transactions. Since relief is afforded in respect of "hedging" operations, it will now be necessary to have them separately stated. Subsection 16 (1) (*d*) provides "for granting to a bookmaker a rebate of betting duty in cases where the whole or any part of the liability in respect of a bet accepted by him is shown to the satisfaction of the Commissioners to have been transferred by him to another bookmaker by means of a fresh bet made by him with that other bookmaker."

It is important to observe that although bets "laid off" are exempt from duty, a return must nevertheless be made in respect of them since duty has first to be paid and then a rebate claimed. "Laid off" bets must be clearly shown in the books and the name of the bookmaker with whom the "hedging" transaction was made must appear.

In obtaining a rebate under Subsection 16 (1) (*d*) in respect of laid-off bets the following particulars must be observed:—

1. Rebate must be claimed on Form B.D. 15.

2. Form B.D. 15 must be signed by one of the persons authorised to sign the weekly returns (*see* Weekly Return Form, point No. 1) or where no arrangement for payment of duty by returns has been made, by the bookmaker or such person authorised by him as the Commissioners shall approve.

3. Form B.D. 16 embodying a certificate from the bookmaker or bookmakers who received the laid-off bets must be sent with Form B.D. 15 to the nearest Collector of Customs and Excise. Where the bookmaker has made an arrangement to pay by returns it will probably be found convenient to forward this claim with the weekly return.

4. Claims for repayment must be made within three months of the date when the bet was laid off.

5. The claims when verified by official inspection of the books of both bookmakers will be either paid or set off as a deduction from the amount shown as due by the next weekly return.

Incidence of Duty

In considering upon whom the cost of the duty shall ultimately fall there are three parties to be considered, the backer, the starting-price man and the course bookmaker.

The Act places the onus of collecting and paying over the duty upon the bookmaker, but there is little doubt that when the Act was passed it was intended to make the backer and not the layer pay,

since the bookmaker has already paid his contribution to the duty in taking out his Personal and Entry Certificates.

Collecting the duty, as has been seen, although placing a burden upon the bookmaker, is not a difficult matter and although naturally strong protests were voiced at the time, the bookmaking profession was not so concerned with the collection of the duty as with the *fact* of the duty, which would tend to curb the operations of backers and so decrease their business.

To make the bitter pill of the duty as acceptable to the backer as may be, various schemes have been put forward by the starting-price man. The arrangement which has gained most prominence has as its basis the idea of charging the client with duty on winnings plus winning stakes (thus, where a bet is won at 10 to 1, the duty chargeable to the client would be £11 at 3½ per cent.) and not charging the client with duty on losing stakes.

A great deal of information has been collected by the starting-price men by way of showing that such an arrangement as that described would mean that the duty would be shared equitably. On the other hand, some prominent backers have brought forward equally enlightening figures to prove that, if they pay on winning stakes plus winnings, they will not only be paying all the duty due from them but also considerably more.

Another argument put forward against the proposed scheme of the starting-price men was that, since, as was probable, the course bookmakers would pay the whole duty themselves, recouping themselves by shortening the price, the backer, betting with a starting-price man, would pay duty

twice over, because his winnings would have already been taxed in the shortened price which would be determined by the transactions on the course.

Time and competition will no doubt bring all bookmakers into line, but at the moment the following alternative methods have been given as practicable :—

Course bookmakers.

1. Will bear the whole tax, recouping themselves by shortening the price.

2. Will charge 2½ per cent. on all winnings plus winning stakes and bear tax on all losing stakes.

Starting-price men.

1. Will charge 3½ per cent. on all winnings plus winning stakes and bear tax on all losing stakes.

2. Will bear the difference between the 3½ per cent. duty and the " recouped " 2 per cent.

3. Will bear the whole tax on overnight business (except ante-post wagers) and charge an additional 2½ per cent. when commissions are placed on day of the race.

4. Will bear the whole tax on all bets up to £5, charging the backer with tax on commissions over that amount.

5. With regard to place betting, will bear all the duty, but place money will go on at one-fifth instead of one-fourth the total odds.

As between the course bookmakers and the starting-price men, it is felt that the effect of the duty will be to transfer a good deal of business from the former class of bookmaker to the latter. It may be wondered why this should be so, since cash bets made on the course attract the lower rate. But the element of uncertainty concerning the

odds given on the course and the recent action of the bookmakers in refusing commissions has alienated much sympathy and backers are more inclined to work on the official starting price. Indirectly the proprietors of racecourses will also benefit by this transference of commissions, since many backers will pay the few extra shillings necessary to obtain admission to those rings (i.e. the silver ring and Tattersall's) where bets on a starting-price basis can be effected.

Bookmakers' Certificates

Personal certificates

By Section 15 (1) (*b*) every bookmaker must take out " a bookmaker's certificate " annually and pay duty in respect thereof amounting to £10. The persons included in the expression " bookmaker " have been set out in Section 18, previously given on page 21.

Application must be made on Form B.D. 1 to the nearest Collector of Customs and Excise together with a remittance for the duty of £10. The particulars required in the form of application are as follows :—

True Christian name and surname, business name and photograph, which should be of the size approximately 3¼ in. × 2¼ in., full face, without hat, and unmounted.

The personal certificates apply equally to limited companies as to partnerships and sole proprietor businesses.

A limited company must take out a certificate in its registered name, and if any directors or employees of the company act for the company on a racecourse, personal certificates must be taken

out for them in addition. All partners in a firm require certificates.

Managers of branch offices and agents whose activities are confined to receiving bets for transmission to particular bookmakers and also recognised commission agents who are engaged by owners or stables to negotiate bets are bookmakers for the purposes of the Act and must take out certificates. But in the case of agents if the amounts received by them are not amounts paid to them *qua* bookmakers, there is no necessity at present for them to keep records of offers to bet which may or may not result in bets being made, or to pay duty on such bets either by issuing tickets or by making weekly returns.

The following summary shows at a glance the persons who do or do not require certificates.

Personal certificate required.

Firms—all partners, or sole proprietor.

Limited companies—credit business—only the company. Cash business—directors or employees concerned.

Managers of branch offices.

Agents for bets.

Personal certificate not required.

Clerks.

Telephone operators.

Messengers.

All persons acting in a subordinate and mechanical capacity.

If there is any doubt as to whether a certificate should or should not be taken out in any particular case the facts should be communicated either to

the local Collector of Customs and Excise or to the Secretary, Custom House, E.C.3.

The personal certificate is current for one year to 31st October, when it must be surrendered to the issuing officer and renewed. There is no reduced rate in respect of certificates which have only part of a year to run and therefore a certificate taken out on, say, 1st March attracts the same duty as one issued on 1st November.

Personal certificates cannot be transferred from one person to another, must always be carried by the bookmaker when conducting business and must be produced on demand by any authorised person.

Entry certificates

By Section 15 (1) (*c*) an Entry Certificate which has to be taken out in respect of betting premises is dutiable in the sum of £10.

Section 18 defines betting premises as meaning " any premises which are kept or used for the purpose of making, receiving or negotiating in any manner whatsoever bets on credit, or which are in any manner held out as being kept or used for any such purpose."

For every set of premises used for the purpose of betting there must be a separate certificate.

Those bookmakers who bet only on the course do not require to take out an entry certificate.

Forms of entry can be obtained from any Collector of Customs and Excise and are numbered :—

B.D. 2 for individuals or private companies.

B.D. 2a for public or corporate companies.

In this connection " private companies " means an association of individuals such as a firm and

not a private *limited* company to which Form B.D. 2a applies.

The regulations issued by the Commissioners are stringent with regard to the entry of the specific premises in which betting is carried on. The reason for this is that Section 16 (2) gives the Commissioners power of search over *betting premises* and runs as follows :—

> " Any officer authorised by the Commissioners for the purpose may enter any place where for the time being betting with bookmakers is being carried on, and also any betting premises, with a view to seeing whether the provisions of this Act and of any regulations made thereunder as to betting duty are being complied with."

The regulations are set out in detail as under :—

1. Betting premises must not have internal communication with any other premises. (A corridor or staircase used in common by the various persons occupying offices in a building is not regarded as internal communication.)

2. Entry can be made of a flat or other premises provided the only means of communication with other offices and parts of the building is by the common corridor or staircase.

3. Entry must be made of the whole premises where a bookmaker conducts his credit business solely from his private residence.

4. No more than one person or firm can by law make entry in respect of one set of premises.

5. One bookmaker carrying on an independent office business cannot share an office with another. But partners or members of the same company may do so.

6. No premises in respect of which an entry certificate is in force may be used for carrying on any business other than that of a bookmaker.

A decision has now been given by the Customs authorities with regard to clubs containing betting offices. In such clubs there are offices which can be rented by bookmakers who are members of the club and it was thought that the first of these regulations would force the layers concerned to give up their offices, since the feature of internal communication was apparent. However, it has now been decided that entry can be made of private rooms in clubs set apart as betting offices providing that all other regulations with regard to the general law and the betting duty are complied with. It is interesting to notice that if a communication concerning betting business has to be made from one office to another within a club it must be made by telephone or speaking tube, since if one bookmaker were to put in an appearance at another's office for the purpose of betting the action would come under the head of " resorting."

With regard to premises used for a business other than that of a bookmaker, where part is used for bookmaking, entry can only be made of the part used for bookmaking if there is no internal communication with the part used for purposes other than bookmaking.

As with personal certificates, certificates of entry are current for the year ending 31st October.

If the circumstances attaching to the entry have not changed it is not necessary for fresh entry to be made in taking out succeeding certificates.

A bookmaker may withdraw an entry for

betting premises at any time provided that he has satisfied the Commissioners that the proper duty has been paid in respect of all bets made with him.

Penalties

Unchanged legal status of betting transactions.

It is important to observe that the Finance Act, 1926, in its provision for the duty on betting does not make betting legal. Section 15 (2) expressly states: "Nothing in this part of this Act shall operate so as to render lawful any betting in any manner or place in which it is at the commencement of this part of this Act unlawful, or so as to authorise the writing, printing, publication or sending of any notice, circular or advertisement which is at that time unlawful."

Thus the official *bete noire* of street betting, estimated in some quarters to amount to 80 per cent. of all betting transactions, is still illegal and the law relating to betting is in no way changed.

With regard to street betting and offences under the Street Betting Act the point has been raised that a bookmaker, arrested on a charge under the Street Betting Act, will argue that the Government were content to take the duty on his personal certificate and the fact that he did not enter any premises shows that they must therefore be aware of the transactions which now form the subject of the prosecution. It is difficult to see the supposed injustice of the situation since by Paragraph 16, No. 129, "Where a bookmaker carries on business on a racecourse but does not transact a credit business in an office a personal certificate only is required . . ." And the Commissioners are not aware at the time of granting the certificate

that the operations are not, in fact, to be confined to racecourses but are to be conducted illegally in the street.

To many minds the imposition of the Betting Duty foreshadows the legalisation of all betting transactions; the idea being, that since the Government is extracting duty from a transaction which is now more or less illegal, the logical conclusion is that betting, in respect of which all contracts are (by the Gaming Act, 1845) unenforceable and void, must be legalised, and, as a consequence, the bookmaker will be able to sue.

Whether or not the legalisation of betting is "the logical conclusion" of the imposition of the Betting Duty does not concern us. But it is interesting to observe that it is not only in betting that the Revenue gain in spite of the illegality of the transaction.

The case of *Universal Stock Exchange v. Strachan* (1896, A.C. 173); *in re Gieve* (1899, 1 Q.B. 794) (Ranking's Mercantile Law) laid down that if an agreement to buy and sell shares is "entered into for differences only, even though it is colourably expressed otherwise, it is in the nature of a wager," which by the Gaming Act is void. Every such contract, however, although void, attracts stamp duty at the usual rate; and although the deciding case is now thirty years old, one hears of no agitation that the Government should legalise the transaction because they are benefiting to the extent of the contract stamp.

Recovery of duty.

Any duty not paid by means of a Revenue ticket is recoverable from the bookmaker with whom the bet is made as a debt due to the Crown.

If the amount of duty is less than fifty pounds, the Commissioners can recover the amount summarily as a civil debt. (Section 15 (4).)

Obstruction.

Section 16 (2) gives any officer authorised by the Commissioners the right of entering and inspecting any premises in respect of which an entry certificate has been taken out. By Subsection 4 of the same section, the authorised officer may, by arrangement between the Commissioners of Customs and Excise and the appropriate police authority, be a police officer and not an officer of Customs and Excise.

Section 16 (2) continues: "If any person prevents or obstructs the entry of any officer so authorised, he shall be liable on summary conviction to a fine not exceeding twenty pounds.

General penalties.

The provisions of Section 17 (1) are extremely stringent.

(A) Any person	(1) Contravening or failing to comply with any of the provisions of the Act or regulations made thereunder; (2) Carrying on business without a personal certificate; (3) Keeping, using or being concerned in the management of any premises in respect of which there is no entry certificate
is liable	(in addition to any liability under Section 15 (4), previously mentioned) to an Excise penalty of £100 for each offence.
(B) Any person	(1) Accepting a bet without issuing a Revenue Ticket (except where the weekly return arrangement has been sanctioned); (2) Failing to produce either his personal or entry certificate when called upon to do so by an authorised person
may be arrested	by any officer without any warrant.

(C) Any person	guilty of any of the above or other offences in connection with his business as a bookmaker and who is
convicted	by any Court
may be disqualified	from holding a bookmaker's certificate for such time as the Court directs.
(D) Any person	while so disqualified
applying for or obtaining	a certificate
is liable	to an Excise penalty of £100.

In either case (C) or (D) if the bookmaker is disqualified, the certificate shall be of no effect.

(E) Any person	who by notice of an order made under this section and
who is disqualified	from holding a certificate
may apply	after the expiration of three months from the date of the order, from time to time,
to the Court to remove the disqualification.	by which the order was made

The Court, in considering the removal of the disqualification, will take into consideration the character and conduct of the person subsequent to conviction, the nature of the offence and the other circumstances of the case.

A Court making any order under this subsection shall cause particulars of the order to be endorsed on any certificate affected by the order and shall send notice of the order to the Commissioners. A certificate so endorsed may not be re-issued so long as the disqualification continues.

Miscellaneous

No Government guarantee.

Paragraph 12, No. 126, expressly states that the issue to a bookmaker of the certificate necessitated by the Act and of Revenue tickets for the payment of duty, does not guarantee in any way the character or financial position of the bookmaker, or

does it connote any change in the existing legal position as to betting contracts.

Bookmakers are also not allowed to state on any notepaper, circulars or advertisements, &c., either directly or by implication, that they bear an official guarantee of their *bona fides*.

Address of Local Officer of Customs and Excise.

Can be obtained from local directory or from the nearest post office.

Revenue tickets regarded as stamps.

Section 16 (3) provides that "the provisions, including the penal provisions, of the Stamp Duties Management Act, 1891, as amended by any subsequent enactment, and Section 65 of the Post Office Act, 1908, shall apply to Revenue tickets as if those tickets were stamps and as if for references therein to the Commissioners of Inland Revenue these were substituted references to the Commissioners."

Income Tax

As has previously been stated, the Act contemplates making the backer and not the bookmaker pay the duty. However, many bookmakers consider that they will have to pay a considerable amount of the duty themselves. The Act nowhere mentions that the duty is a charge against profits, as indeed it is not, if recoverable from the backer, and it will be interesting to observe the attitude the Inland Revenue take in the matter of duty unrecouped from a bookmaker's clients. But providing proper accounts have been kept of the amounts paid out for betting duty, there should be no difficulty in getting the Inspector to pass the item.

Conclusion

The imposition of a new tax gives birth to a constantly increasing number of departmental provisions, and the Betting Duty is not yet fully emerged from this state of flux and uncertainty. No effort, however, has been spared to bring the text up to date, but there are, no doubt, certain matters which call for adjustment.

In some cases the interpretations and explanations may seem elementary, and perhaps unnecessary, but they have been included in the hope that they may help in an understanding of general principles. Particularly is this so in Part I, where individual experience must vary greatly.

In extenuation of any deficiencies, the author, praying indulgence, pleads the difficulties attendant upon the preparation of a text-book where there is no precedent bibliography.

PART III

SECTIONS RELATIVE TO BETTING DUTY IN FINANCE ACT, 1926

FINANCE ACT, 1926

PART II

BETTING DUTY

15.—(1) There shall, on and after the first day of November, nineteen hundred and twenty-six, be charged, levied and paid the following duties of excise, that is to say :—

(*a*) On every bet made with a bookmaker a duty (in this Part of this Act referred to as " betting duty ") at a rate equal to three-and-a-half per centum of the amount paid or offered, or promised to be paid to, or to the order of for the use of, the bookmaker, or in the case of a bet in respect of a horse race made on any ground used for the purpose of a racecourse for racing with horses, or on any ground adjacent thereto, on a day on which horse racing takes place thereon, and made with a bookmaker attending at that ground by a person so attending, equal to two per centum of that amount :

(*b*) On a certificate (in this Part of this Act referred to as " a bookmaker's certificate ") to be taken out annually by a person carrying on the business of a bookmaker, a duty of ten pounds :

(*c*) On a certificate (in this Part of this Act referred to as " an entry certificate ") to be taken out annually by a bookmaker in respect of the entry for any betting premises kept or used by him, a duty of ten pounds.

(2) Nothing in this Part of this Act shall operate so as to render lawful any betting in any manner or place in which it is at the commencement of this Part of this Act unlawful, or so as to authorise the writing, printing, publication or sending of any notice, circular or advertisement which is at that time unlawful.

(3) Betting duty shall be payable by the bookmaker with whom the bet is made, and every bookmaker (other than a bookmaker who has made an arrangement approved by the Commissioners for furnishing returns of all bets made with him and has given security up to an amount and in a manner approved by the Commissioners for the payment of the betting duty thereon) with whom a bet is made shall immediately on the making of the bet issue to the person by whom the bet is made a ticket (not before used) in the prescribed form denoting that the proper betting duty has been paid (in this Part of this Act referred to as " a revenue ticket ").

(4) Any betting duty not paid by means of a revenue ticket shall be recoverable from the bookmaker with whom the bet was made as a debt due to the Crown, and, if the amount of the duty is less than fifty pounds, may, without prejudice to any other means of recovery, be recovered by the Commissioners summarily as a civil debt.

(5) Bookmakers' certificates and entry certificates—

(*a*) shall be in the prescribed form ;

(*b*) shall be granted only on payment of the duty chargeable thereon ;

(*c*) shall expire on the thirty-first day of October in every year.

(6) References in this Part of this Act to a " certificate " shall, unless the context otherwise requires, be construed as references to both a bookmaker's certificate and an entry certificate.

16.—(1) The commissioners may make regulations for securing the payment of betting duty and of the duties payable in respect of certificates and generally for carrying the provisions of this Part of this Act into effect, and in particular—

(*a*) for regulating the supply and use, and prescribing the form, of revenue tickets, and for securing the defacement of revenue tickets when used ;

(*b*) for prescribing the form of certificates and the form in which entry is to be made of betting premises ;

(*c*) for requiring the production by bookmakers of their certificates and of any books, accounts, vouchers, revenue tickets or other documents relating to the business carried on by them as such, and for authorising any officer to examine and take copies of or extracts from any such documents ;

(*d*) for granting to a bookmaker a rebate of betting duty in cases where the whole or any part of the liability in respect of a bet accepted by him is shown to the satisfaction of the Commissioners to have been transferred by him to another bookmaker by means of a fresh bet made by him with that other bookmaker.

(2) Any officer authorised by the Commissioners for the purpose may enter any place where for the time being betting with bookmakers is being carried on, and also any betting premises, with a view to seeing whether the provisions of this Act and of any regulations made thereunder as to betting duty are being complied with.

If any person prevents or obstructs the entry of any officer so authorised, he shall be liable on summary conviction to a fine not exceeding twenty pounds.

(3) The provisions, including the penal provisions, of the Stamp Duties Management Act, 1891, as amended by any subsequent enactment, and section sixty-five of the Post Office Act, 1908, shall apply to revenue tickets as if those tickets were stamps and as if for references therein to the Commissioners of Inland Revenue there were substituted references to the Commissioners.

(4) The Commissioners may, if they think fit, by agreement in writing with any police authority arrange for the exercise by that authority, either concurrently with the Commissioners or to the exclusion of the Commissioners, of any powers of the Commissioners in relation to the duties chargeable under this Part of this Act, and, so far as may be required for the purpose of giving effect to any such arrangement, the provisions of this Part of this Act and any regulations made thereunder shall have effect as if the police authority and any officer authorised by that authority were mentioned therein in addition to, or were substituted for, the Commissioners and an officer of Customs and Excise.

Any such arrangement with a police authority may provide for the payment out of moneys provided by Parliament of any expenses incurred by the authority in carrying out the arrangement.

17.—(1) If any person—

(*a*) contravenes or fails to comply with any of the provisions of this Part of this Act or of any regulations made thereunder; or

(*b*) carries on business as a bookmaker without having in force a proper certificate; or

(*c*) keeps or uses any betting premises in respect of which there is not a proper entry certificate in force, or assists or is concerned in the management of any such premises;

he shall (without prejudice to his liability to any other penalty or his liability to pay any sum in respect of duty under this Part of this Act) be liable, in respect of each offence, to an Excise penalty of one hundred pounds.

(2) Any person—

(*a*) who is found committing the offence of accepting a bet without issuing a revenue ticket; or

(*b*) who, on being duly required in accordance with the provisions of any regulations made under this Part of this Act to produce a bookmaker's certificate, fails so to do;

may without any warrant be arrested by any officer.

(3) Any court before which a bookmaker is convicted of any offence under this Part of this Act or otherwise in connection with his business as a bookmaker, may order him to be disqualified for holding a bookmaker's certificate for such period as the court may think fit, and any such certificate held by him shall, so long as the disqualification continues, be of no effect, and if any person applies for or obtains such a certificate while he is so disqualified he shall be liable to an Excise penalty of one hundred pounds, and any certificate so obtained shall be of no effect;

Provided that a person who by virtue of an order made under this section is disqualified for obtaining a bookmaker's certificate may, at any time after the expiration of three months from the date of the order, make from time to time an application to the court by which the order was made to remove the disqualification, and on any such application the court may by order, as it thinks proper having regard to the character of the person and to his conduct subsequent to conviction, the nature of the offence and the other circumstances of the case, either remove the disqualification as from such date as may be specified in the order, or refuse the application, and may in any event make such order as to costs as it thinks proper.

A court making any order under this subsection shall cause particulars of the order to be endorsed on any certificate affected by the order and shall send notice of the order to the Commissioners.

18.—(1) In this Part of this Act, unless the context otherwise requires—

The expression "bet" means a bet on an event of any kind;

The expression "bookmaker" means any person who, whether on his own account or as servant or agent to any other person, carries on, whether occasionally or regularly, the business of receiving or negotiating bets, or who in any manner holds himself out or permits himself to be held out in any manner as a person who receives or negotiates bets;

The expression "betting premises" means any premises which are kept or used for the purpose of making, receiving or negotiating in any manner whatsoever bets on credit, or which are in any manner held out as being kept or used for any such purpose;

The expression "officer" means an officer of Customs and Excise, and includes any person expressly authorised by the Commissioners to perform the duties of an officer of Customs and Excise for the purposes of this Part of this Act;

The expression "police authority" means a police authority within the meaning of the Police Pensions Act, 1921.

PART IV

REGULATIONS MENTIONED IN TEXT

NOTICE No. 126

BETTING DUTY

PRELIMINARY NOTICE BY THE COMMISSIONERS OF CUSTOMS AND EXCISE

NOTHING IN THIS PRELIMINARY NOTICE IS TO BE REGARDED AS IN ANY WAY MODIFYING THE STATUTORY REQUIREMENTS

1. *Law and date of Operation.*—The relative sections of the Finance Act, 1926, imposing a duty on betting, are printed in Appendix A to this notice. It will be observed that the duty operates on and after 1st November 1926.

2. *Scope.*—The duty will apply to every bet made with a bookmaker, on any event of any kind. Section 18 contains a definition of the persons who will be regarded as bookmakers.

3. *Bookmakers' Personal Certificates.*—Each bookmaker will be required to take out annually a certificate for which a duty of £10 will be payable. Forms of application for certificates are obtainable from any Collector of Customs and Excise named in the attached List (Appendix B). It will be convenient if bookmakers will apply for a form of application as soon as possible. Payment of duty in respect of the certificate will not be required in connection with a request by a bookmaker for a form of application, but a bookmaker will be required to remit the sum of £10 when he forwards the form of application to the Collector of Customs and Excise. Each applicant will be required to show on the form of application his true Christian name and surname, together with his business name—thus, A.B. trading as A.B. or X.Y. (as the case may be). With each application a photograph of the size, &c., prescribed in the form must be forwarded for fixing to the certificate. The certificate will show the true name and the trade name in the same manner, and must be produced on demand by any authorised person.

4. A limited Company will be required to take out a certificate in the registered name of that Company. In addition any directors

or employees of the Company who may act as bookmakers on a racecourse will be required to take out personal certificates in their own names. Each partner of a firm, not being a limited Company, must have a personal certificate in his own name. Certificates will expire on the 31st October in each year.

5. *Entry Certificates for Betting Premises.*—An Entry Certificate will be required to be taken out annually by a bookmaker on payment of a duty of £10 in respect of any betting premises used by him (see definition in Section 18 of the Act). Forms on which entry of premises may be made will be obtainable from Collectors of Customs and Excise, and in the case of office bookmakers requests for the supply of these forms should be made at the same time as requests for the forms of application for a personal certificate. In cases of any doubt or difficulty as to the proper completion of the form of entry the local officer of Customs and Excise should be consulted. The address of the nearest officer may be obtained from the local directory or by inquiry at a Post Office. The bookmaker will be required to insert in the form of entry a description of the betting premises and he will not be allowed to carry on an office business except on premises duly entered. Authorised officers will have the right to inspect such premises at any time for the purpose of revenue supervision. The provisions as to expiration are the same as in the case of bookmakers' certificates.

6. *Rate.*—Duty will be chargeable at the rate of 2 per cent. of the amount staked in the case of bets which fulfil all the following conditions, viz. :—

(*a*) the event must be a horse race ;

(*b*) the bet must be made on a ground used for the purpose of racing with horses, or any ground adjacent thereto ;

(*c*) the bet must be made on a day on which horse-racing takes place on such ground ;

(*d*) both the bookmaker accepting and the person making the bet must be in personal attendance at that ground.

In the case of every other bet made with a bookmaker, the duty will be at the rate of 3½ per cent. of the amount staked.

7. *Payment of Duty.*—The bookmaker will be the person responsible for payment of the proper duty to the Commissioners of Customs and Excise in respect of all bets made with him.

8. *Method of Payment.*—There will be two methods by which a bookmaker may pay the betting duty, viz., by returns to the Commissioners or by the use of Revenue tickets. These methods are explained in the following paragraphs.

9. *Returns.*—It will be open to any bookmaker, whether operating in an office or on the course, to apply to the Commissioners for permission to pay by returns. As a condition of the grant of such application the bookmaker will be required to give bond with one or more satisfactory sureties for due payment of duty. Such sureties may be private individuals or surety may be given through an approved Guarantee Society. Under such an arrangement a bookmaker will furnish returns at weekly intervals of all bets received by him and pay at such intervals the appropriate amount of duty. The bookmaker will be required to keep proper books and records for official inspection.

The amount of duty payable will be calculated by reference to such returns and records. No Revenue tickets will be required. Any bookmaker who wishes to enter into such an arrangement should apply forthwith to the Secretary, Custom House, London, E.C.3.

10. *Revenue Tickets.*—Bookmakers who do not enter into an arrangement for payment of duty by means of returns must pay duty by the purchase of Revenue tickets. These tickets will be purchasable in books of 50 tickets, either on personal application from the Collector of Customs and Excise, Betting Duty Branch, Custom House, London, E.C.3, or from the local Collector of Customs and Excise, or by post from the Collector of Customs and Excise, Betting Duty Branch, as above.

Supplies of tickets will be available early in October next. Tickets will be available in the following denominations :— 1s., 2s., 2s. 6d., 3s., 4s., 5s., 10s., £1, £2 and £5.

Duty will be payable on the number of tickets in the book at the appropriate rate of duty, e.g. a book of 50 tickets for 2s. bets at the 2 per cent. rate will cost 2s., and a book of 50 tickets for 5s. bets at the 3½ per cent. rate will cost 8s. 9d., and so on. The ticket will be automatically defaced on being torn from the book and no question of the use of adhesive stamps will arise.

Arrangements will be made for the refund of duty in respect of unused Revenue tickets.

11. *Betting Law.*—Special attention is drawn to Section 15 (2) which provides that "*Nothing in this Part of this Act shall operate so as to render lawful any betting in any manner or place in which it is at the commencement of this Act unlawful, or so as to authorise the writing, printing, publication or sending of any notice, circular or advertisement which is at that time unlawful.*"

12. *No Government Guarantee.*—It is, moreover, to be noted that the issue of a certificate to a bookmaker and the use by him of Revenue tickets for the duty do not connote any change in the existing legal position as to betting contracts, nor do they carry any Government guarantee of the character or financial position of the bookmaker.

The use by bookmakers on notepaper or in circulars, advertisements, &c., of any statements implying official guarantee of *bona fides* will not be allowed.

CUSTOM HOUSE,
LONDON, E.C.3.

6th August 1926

Notice No. 126. Sec. 45874
1926

NOTICE No. 128

NOTE.—This notice is supplementary to the preliminary Notice No. 126 regarding the Betting duty which was issued by the Commissioners of Customs and Excise on the 6th August 1926. Copies of Notice No. 126 may be obtained from the Secretary, Custom House, London, E.C.3, or from any Collector of Customs and Excise.

BETTING DUTY

NOTICE BY THE COMMISSIONERS OF CUSTOMS AND EXCISE

PAYMENT OF DUTY

1. Betting duty at the rate of 2 per cent. or 3½ per cent. of the stake, as the case may be, must be paid by the bookmaker on bets made with him. There are two optional methods of paying the duty, either (*a*) by the issue of Revenue tickets immediately on the making of a bet, or, (*b*) by arrangement with the Commissioners of Customs and Excise on the basis of weekly returns of bets made. It will be for each bookmaker to choose one or other method, but no bookmaker will be allowed to use both methods concurrently. While freedom of choice will be left as far as possible to each bookmaker, approval of an arrangement for payment on returns will only be given by the Commissioners where they are satisfied as to the circumstances of the case, and where adequate security has been given for the duty involved.

2. In every case, whether payment is made by tickets or on returns, each bookmaker must keep a record of every bet made with him so as to show (i) the date of the bet, (ii) its amount, (iii) the condition attaching to it (e.g. "double," "each way," &c.), (iv) the rate of duty in the case of a horse race, (i.e., whether 2 per cent. or 3½ per cent.) and (v) the number of the Revenue ticket issued (or in cases where tickets are not used, sufficient particulars to identify each bet). The Commissioners do not intend for the present to prescribe a definite form of book. The books already in use by bookmakers, whether operating in betting premises or on the course, will be considered satisfactory, provided that the required particulars are shown.

TICKETS

3. Revenue tickets are now available in books of 50 tickets, which may be purchased by post either from the Collector of Customs and Excise, Betting Duty Branch, Custom House, London, E.C.3, or from the Collector of Customs and Excise, Waterloo Place, Edinburgh. They may also be obtained on personal application at the office of any Collector of Customs and Excise named in the attached list (appendix). It will probably be found that the most convenient course will be to order tickets by post, and in sending orders for tickets, to use the order forms which may be obtained from any Collector by post or on personal application. Tickets will be sent by registered post, carriage paid. Orders by post will normally be executed within 24 hours. On presentation of a completed order form at any Money Order Office in Great Britain, a Money Order free of poundage will be issued for the amount of the remittance. When cheques are sent, sufficient time must be allowed for clearance through the bank, but cheques guaranteed by the issuing bank will be accepted as cash. Coin, Treasury Notes, or open remittances should not be sent.

4. The varieties of tickets and the duties of Excise payable on each book of 50 tickets are shown below :—

Amount of Bet	*Duty payable per book of 50 tickets*	
	At 2 per cent.	At 3½ per cent.
£ s d	£ s d	£ s d
0 1 0	0 1 0	0 1 9
0 2 0	0 2 0	0 3 6
0 2 6	0 2 6	0 4 4½
0 3 0	0 3 0	0 5 3
0 4 0	0 4 0	0 7 0
0 5 0	0 5 0	0 8 9
0 10 0	0 10 0	0 17 6
1 0 0	1 0 0	1 15 0
2 0 0	2 0 0	3 10 0
5 0 0	5 0 0	8 15 0

5. All Revenue tickets bear distinctive serial numbers which the bookmaker will find it convenient to use for purpose of record in his course book or other account. The colours of the tickets are also distinctive, e.g., all tickets for 1s. bets are yellow, all tickets for 2s. bets are dark blue, all tickets for 2s. 6d. bets are pink, &c., whether liable to duty at 2 per cent. or 3½ per cent. Tickets at the 3½ per cent. rate bear three vertical red lines, but those at the 2 per cent. rate bear no such lines.

6. It will not be permissible for a bookmaker using Revenue tickets to issue, in respect of any bet made with him, any form of ticket other than a Revenue ticket, and the face of the ticket must not be marked in any way. But the reverse of the Revenue ticket is unprinted and may be used by the bookmaker for stamping by rubber stamp or otherwise, his name and other particulars. For the initial issue of tickets, time does not permit of arrangements being made for printing the bookmaker's name, &c., on the reverse side of the tickets, but requests for such printing to be done at the bookmaker's expense will be considered in connection with later issues on application being made to that effect.

7. A bookmaker using Revenue tickets must issue them from each book in strict numerical order. He must also, immediately on the making of a bet, deface one or more Revenue tickets of the appropriate denominations by dividing each such ticket at the perforation thereon and issue such ticket by delivering one portion to the person by whom the bet is made and retaining the counterfoil himself. (In the case of an office bookmaker using Revenue tickets, the portion must be sent by post.)

8. Bookmakers should obtain as soon as possible from the sources indicated in paragraph 3 any necessary supplies of tickets for use on and after 1st November. As a provisional measure, endeavour will be made to secure that tickets will be on sale at the principal race-meetings during the early days of the operation of the duty. Such emergency stocks must necessarily be limited and bookmakers would do well, therefore, not to rely upon them for their ordinary supplies.

9. The conditions which must all be fulfilled before a bet is chargeable at the 2 per cent. rate of duty were set out in Notice No. 126. On bets which do not fulfil *all* those conditions, duty at the 3½ per cent. rate must be paid. Bookmakers must be careful therefore to see that they supply themselves with tickets at the proper rate of duty. In some cases a bookmaker may require to use tickets at both rates during the same meeting.

Thus a bookmaker operating at a ground where dog racing or foot racing is carried on in addition to horse racing must use tickets at the 3½ per cent. rate for the dog and foot races. Similarly a bookmaker at a horse race meeting would require tickets at the 3½ per cent. rate if he receives bets by wire, &c., from a person who is not in personal attendance at the ground. It is an offence to issue a ticket at the 2 per cent. rate in a case where the 3½ per cent. rate is proper, or for an amount less than the amount of the bet.

Returns

10. A bookmaker whether operating on the course or in an office may apply to the Commissioners on form B.D. No. 10 for permission to dispense with the use of Revenue tickets and in lieu thereof to make an arrangement with them, whereby, subject to adequate security, betting duty will be paid on the basis of the weekly returns of bets made with him. A copy of form B.D. No. 10 may be obtained on request to the Secretary, Custom House, London, E.C.3.

11. During the continuance of such an arrangement the bookmaker with whom it is made will not be allowed to use Revenue tickets, but he may, if he so desires, use personal tickets. In addition to the record of bets, which is compulsory on all bookmakers (see paragraph 2), he must keep in a special book an abstract of the bets made in each week ending Friday, either by reference to events, or by reference to individual accounts, whichever may be more convenient to the bookmaker. The return must show the total amount of bets received during each week ending Friday at the 2 per cent. and 3½ per cent. rates of duty respectively. It must be sent to the proper Collector of Customs and Excise not later than the Wednesday following the week to which it relates, and must be accompanied by a remittance for the amount of duty due. The address of the Collector to whom the return is to be sent will be communicated when the arrangement is approved.

Bonds

12. As an essential condition of the approval of an arrangement for payment on returns, the bookmaker will be required to enter into bond for the due payment of the duty and the observance of the conditions under which the arrangement is approved. The amount of the penalty of the bond will be a sum not less than the estimated duty for a period of four weeks.

13. The bond must be signed by the bookmaker as principal and also be signed by a surety, who may be an individual (in the

case of large bonds, two individual sureties may be required, a bank or a guarantee society). Where the bookmaker does not wish to obtain personal sureties, or the services of a guarantee society, he may be able, by depositing cash or securities with his bankers, to arrange for the bank to act as surety.

14. Where there is not sufficient time for a bookmaker to complete his bond and surety arrangements by the date on which he wishes to begin paying duty on returns, he may deposit cash with the Commissioners, as a temporary arrangement pending completion of a bond. During the interim period the deposit will be subject to total or partial forfeiture in the event of a failure to pay duty or to comply with the required conditions, and on its termination the cash will be returned without interest.

15. When permission to pay on returns has been allowed the Commissioners will issue formal letters of approval which must be produced on demand to any authorised officer and must be returned to the Commissioners on the termination of the arrangement.

16. Forms of return (B.D. No. 11) on which the weekly totals of bets and the amount of duty payable are to be entered will be supplied to each bookmaker. The forms contain instructions as to procedure and show what is to be done in the returns respecting laid-off bets, void bets, non-starters, temporary cessation of business, &c.

General

17. A bookmaker must keep every book, account voucher, counterfoil of Revenue ticket and other document relating to his business for a period of six months and they must be produced for inspection, if and when required, to any authorised officer.

Custom House,
London, E.C.3.

6th October 1926.

Notice No. 128.

Nothing in this notice is to be regarded as in any way modifying the statutory requirements.

NOTICE No. 129

Note.—This notice is supplementary to and should be read together with the preliminary Notice No. 126 regarding the Betting Duty which was issued by the Commissioners of Customs and Excise on the 6th August 1926. Copies of that notice and of a further Notice No. 128 issued 6th October 1926 relating to the payment of Betting Duty may be obtained from the Secretary, Custom House, London, E.C.3, or from any Collector of Customs and Excise.

BETTING DUTY

NOTICE BY THE COMMISSIONERS OF CUSTOMS AND EXCISE

CERTIFICATES AND ENTRIES

Bookmakers' Personal Certificates

1. A bookmaker's personal certificate is required by every person who, on and after 1st November 1926, carries on the business of a bookmaker as defined in Section 18 of the Finance Act, 1926. That section states that :—

> " The expression 'bookmaker' means any person who, whether on his own account or as servant or agent to any other person, carries on, whether occasionally or regularly, the business of receiving or negotiating bets, or who in any manner holds himself out or permits himself to be held out in any manner as a person who receives or negotiates bets."

2. These certificates are now available and can be obtained from any Collector of Customs and Excise by completing an application on Form B.D.1 and sending it to the nearest Collector together with a remittance for the duty of £10. Forms of application for a certificate can also be obtained from any Collector of Customs and Excise, a list of whom is printed with this notice. Where the form has already been completed and the remittance sent, certificates will be issued without delay.

3. The personal certificate is not transferable to any person and does not authorise the conduct of the business of a bookmaker by any person other than the person named in it. It must be carried by the bookmaker when he is transacting his business and must be produced on demand to any officer. Failure to produce a certificate on demand involves liability to penalties.

4. In the matter of office businesses it is to be noted that the personal certificate is additional to the entry certificate which is required in respect of betting premises and which is described later.

A limited company requires a personal certificate in the name of the company and a private firm (not being a limited company) requires personal certificate for each partner. And in either case, if in addition to the main office of the company or firm, there should be a branch office in charge of a responsible manager, that manager will require a personal certificate.

5. Persons employed by and under the direction of bookmakers in a merely subordinate and mechanical capacity (such as clerks, telephone operators, messengers, etc.) are not required to take out personal certificates.

6. Agents whose activities are confined to receiving bets for transmission to particular bookmakers and also recognised commission agents who are engaged by owners or stables to negotiate bets are bookmakers for the purposes of the Act as carrying on the business of receiving or negotiating bets. They must, therefore, take out personal certificates. But if bets are not made with them in the sense of the charge to duty on bets under Section 15 (1) (*a*) of the Finance Act, 1926, they will not, for the present, be required to keep records of offers to bet which may or may not result in bets being made or to pay duty on such bets either by issuing tickets or by making weekly returns. The responsibility for payment of duty will rest upon the bookmaker with whom the bets are actually made.

7. Between persons who must take out personal certificates because they receive or negotiate bets (see paragraph 6) and persons who need not because they are merely assistants to a bookmaker (see paragraph 5) the broad line of demarcation has been indicated. In any cases of difficulty or doubt, the facts should be communicated either to the local Collector of Customs and Excise or to the Secretary, Custom House, London, E.C.3. It will be an offence for any person to carry on the business of a bookmaker after 1st November 1926 without having in force a personal certificate.

8. Bookmakers' personal certificates have validity for a year ending 31st October and those issued now will expire on 31st October 1927, when they must be surrendered to the issuing officer. There is no provision for the issue of part-year certificates at a reduced rate.

9. Attention is drawn to the provisions of Section 17 (3) of the Act under which a Court has the power to disqualify a bookmaker from holding a certificate for a period if he should be convicted of an offence against that part of the Finance Act, 1926, relating

to the betting duty, or otherwise in connection with his business as a bookmaker. In such case the certificate which will be endorsed by the Court must be surrendered and may not be re-issued so long as the disqualification continues. It is an offence to apply for another certificate during the continuance of a period of disqualification.

Entry Certificate for Betting Premises

10. An entry certificate which is separate from and additional to a personal certificate is required in respect of any betting premises. Section 18 of the Finance Act, 1926, defines betting premises as meaning—

> "any premises which are kept or used for the purpose of making, receiving or negotiating in any manner whatsoever bets on credit, or which are in any manner held out as being kept or used for any such purpose."

11. An entry certificate must be taken out for each set of such premises. Forms of entry (B.D. No. 2 in the case of individuals or private companies, B.D. No. 2a in the case of public or corporate companies) may be obtained from any Collector of Customs and Excise and the entry certificates are now available for issue on payment of the duty of £10. Certificates will be issued without further application to those whose entry of premises has been completed in accordance with the directions on the form of entry and who have paid the £10 duty.

12. Betting premises must not have internal communication with any other premises. A corridor or staircase used in common by the various persons occupying offices in a building is not regarded as internal communication. Thus a bookmaker can make entry of a flat or set of offices in his occupation although the rest of the building in which such flat or offices is contained is in the occupation of other persons, provided that the only communication with the premises of the other persons is by such a corridor or staircase as is mentioned above. In cases where a bookmaker has no office but uses his personal residence as betting premises, entry may be made of the whole premises.

13. No more than one person or firm can by law make entry in respect of one set of premises. It will not, therefore, be open to bookmakers carrying on independent office businesses to share an office, but partners or members of the same company may do so.

14. No premises in respect of which an entry certificate is in force may be used for carrying on any business other than that

of a bookmaker. Thus entry cannot be made of premises consisting of a shop in which a business other than that of a bookmaker is carried on or of such a shop together with a room communicating internally with one another. But separate entry may be made of a room adjoining a shop if used solely as betting premises, and having no internal communication with the shop (see paragraph 12).

15. The entry certificate has validity for a year ending 31st October and part year certificates at a reduced rate are not issued. Those issued now will expire on 31st October 1927, and although fresh certificates will be required in respect of periods after that date, fresh entry need not be made provided that the circumstances have remained unchanged. A bookmaker may withdraw an entry for betting premises at any time provided that he has satisfied the Commissioners that the proper duty has been paid in respect of all bets made with him.

16. Where a bookmaker carries on business on a racecourse but does not transact a credit business in an office a personal certificate only is required. Where both a course and an office business are carried on, or an office business only, both certificates are required, viz., personal certificate and entry certificate.

GENERAL

17. The issue of a certificate or certificates to a bookmaker involves no change in his legal standing and affords no defence in any prosecution taken under the general law of the country relating to betting. In this connection attention is again drawn to the provisions of Section 17 (3) of the Finance Act, 1926, under which any Court before which a bookmaker is convicted of any offence in connection with the betting duty or otherwise in connection with his business as a bookmaker may order him to be disqualified for holding a bookmaker's personal certificate for such period as the Court may think fit.

CUSTOM HOUSE,
LONDON, E.C.3.

11*th October* 1926.

Notice No. 129.

Nothing in this notice is to be regarded as in any way modifying the statutory requirements.

NOTICE No. 130

BETTING DUTY

NOTICE BY THE COMMISSIONERS OF CUSTOMS AND EXCISE

I. LAID-OFF BETS—REBATE CLAIMS

1. Regulations will shortly be issued under Section 16 (1) (*d*) of the Finance Act, 1926, for granting to a bookmaker a rebate of betting duty in cases where the whole or any part of the liability in respect of a bet accepted by him is shown to the satisfaction of the Commissioners of Customs and Excise to have been transferred by him to another bookmaker by means of a fresh bet made by him with that other bookmaker.

2. Under these regulations each bookmaker will be required to pay duty on all bets made with him and if he desires repayment of duty on bets laid-off with another bookmaker he must make a claim on the prescribed form (B.D. No. 15) giving the particulars required. The form must be signed by one of the persons authorised to sign the weekly returns, or where no arrangement for payment of duty by returns has been made, by the bookmaker or such person authorised by him as the Commissioners shall approve.

3. The claim must be supported by a certificate or certificates on form B.D. No. 16 from the bookmaker or bookmakers who receive the laid-off bets, and should be forwarded to the nearest Collector of Customs and Excise (see the list printed with this notice). Where the bookmaker has made an arrangement to pay by returns it will probably be found convenient to forward this claim with the weekly return.

4. Every claim for repayment must be made within three months of the date when the bet was laid-off.

5. The claims will be verified periodically at frequent intervals by an official inspection of the books both of the bookmaker who makes the claim and the bookmaker who issues the certificate. Laid-off bets must, therefore, be clearly distinguished as such in the books of both bookmakers.

6. As and when the claims are verified and found to be in order payment of rebate will be made by the Collector or, if so desired, credit for the amount of the rebate may be given on the next weekly return.

7. Forms of Claim B.D. No. 15 and Certificates B.D. No. 16 may be obtained from any Collector of Customs and Excise.

II. Allowance on Unused or Spoiled Revenue Tickets

8. Application may be made for allowance in respect of unused Revenue tickets for which the bookmaker has no immediate use or which have been inadvertently spoiled.

9. Applications for allowance should be made personally to Collectors of Customs and Excise, or *by post* to the Accountant and Comptroller-General, Betting Duty Branch, Custom House, London, E.C.3.

10. No allowance can be made for lost tickets or for tickets which have been mutilated or torn from the book, or which were not purchased within two years next preceding the application.

11. Forms of declaration and claim may be obtained from any Collector of Customs and Excise or from the Accountant and Comptroller-General.

III. Void Bets—Repayment of Duty

12. In cases where bets become void, e.g. by reason of the abandonment of a meeting or part of a meeting; where bets have been made on a "non-starter"; where "place" bets do not materialise; where the nominator of a horse dies, &c.; such bets will not be charged with duty and need not be included in the weekly returns furnished to the Commissioners. In cases where duty has already been paid the duty is repayable.

13. Application for repayment where duty has been paid must be made on form B.D. No. 22 to Collectors of Customs and Excise from whom copies of the form of application may be obtained. If duty has been paid by means of a revenue ticket, the ticket should be forwarded with the claim where possible.

Custom House, London, E.C.3.
4th November 1926.

Notice No. 130. Sec. 70441
1926

NOTICE No. 131
BETTING DUTY
NOTICE BY THE COMMISSIONERS OF CUSTOMS AND EXCISE

"Doubles," "Accumulators," &c.

In the case of bets of the "double" or "accumulator" type (i.e. a bet made on two or more horses or two or more events) the charge to betting duty will operate as follows:—

(*a*) *Where the backer stakes an amount on two or more horses jointly at definite odds which are agreed upon at the time the bet is made.* For purposes of betting duty this transaction will be treated as a single bet, and duty will be charged accordingly as for a single bet.

Example.—A backer stakes £1 on horse A. for the Cesarewitch and on horse B. for the Cambridgeshire at agreed odds of 48 to 1. Duty is chargeable on £1.

(*b*) *Where the backer stakes an amount on horse A. on the understanding that if horse A. wins, the proceeds, i.e. stake and winnings, are to be invested on horse B. and so on.* Here also the transaction will be treated as a single bet for betting duty purposes and duty will be charged as under (*a*) above.

Example 1.—A backer stakes £1 on A. and B. at starting price. Duty is chargeable on £1.

Example 2.—A backer has a bet "£1 mixed doubles the favourites." In this case there will be a series of "doubles" the number of which will depend on the number of favourites to which the commission applies. Each possible combination of two favourites will involve a separate "double," and each such "double" will be treated as a single bet for duty purposes. For instance, where there are six favourites in the series of events covered by the backer's commission, there will be fifteen combinations of two favourites involving fifteen separate doubles, each of which will be taxed as a single bet. Thus where the sum specified in the commission is £1 and the number of favourites six, duty will be charged on £15 in all, i.e. 15 bets of £1 each.

(*c*) *Where a backer stakes an amount on horse A., and if it wins, a further stake on horse B., either of fixed amount or some proportion, say one-half, of his winnings on horse A. and so on.* In this case, for betting duty purposes, there are as many bets as there are amounts staked, and duty is chargeable on the amount of the original stake and also on each of the successive amounts staked.

Example 1.—A backer stakes £1 on A. "if cash £3 cross B." Her there is a bet of £1 and also a bet of £3, and duty is chargeable accordingly on £4.

Example 2.—A backer stakes £1 on A. and B. "up and down single stakes." Here there is a bet of £1 on A. and another bet of £1 on B., and if both win, there is a further bet of £1 on A. and also on B. Duty is chargeable accordingly on £4.

The procedure outlined at (*a*), (*b*) and (*c*) will apply to similar bets on events other than horse races.

Custom House, London, E.C.3.
11th November 1926.
Notice No. 131.

PART V

FORMS MENTIONED IN TEXT

FORM B.D. No. 1

BETTING DUTY

APPLICATION FOR A BOOKMAKER'S CERTIFICATE

(*a*) The true Christian name (or names) and surname must be inserted.

(*b*) Fixed private address.

(*c*) The business name and office address (if any) should be stated.

I, (*a*).....
of (*b*).....
in the County of.....
carrying on business in the name or style of
(*c*).....
.....
.....
at .....
.....
hereby make application for a BOOKMAKER'S CERTIFICATE for which I tender the sum of TEN POUNDS.

(*d*) Delete in the case of a Limited Company.

(*d*) I enclose my photograph to be affixed to the Certificate.

I declare that I am not disqualified by any order of Court under section 17 (3) of the Finance Act, 1926, for holding a Bookmaker's Certificate.

(*e*) Delete if inapplicable.

(*e*) I am not at present the holder of a Bookmaker's Certificate.

(*e*) I return my former Bookmaker's Certificate for cancellation.

Dated.....

Signature.....

B.D. No. 1. Sec. 42247 1926

NOTES.

A Free Money Order for the amount payable hereon can be obtained at any Postal Money Order Office upon production of this Form duly completed. It must be issued in favour of the Commissioners of Customs and Excise, and be sent to the nearest Collector of Customs and Excise (see Appendix) on the day of issue, together with this form.

Bank Notes, Treasury Notes or Coin should not be sent through the post in unregistered packets.

Cheques will only be accepted as cash in advance of clearance if they are guaranteed by the issuing bank.

Application for renewal can be made at any time after 1st October.

PHOTOGRAPH. The photograph should be of the size approximately 3¼″ × 2¼″, full face, without hat, and unmounted.

FORM B.D. No. 2

Before filling in this form attention should be directed to the Notes on the back hereof.

BETTING DUTY

ENTRY FORM

1. True Christian and surname at full length.

2. Number or name of house, street and town.

3. To be stated with sufficient fullness to ensure identification.

I, (1).....
.....
.....
residing at (2).....
in the county of.....
carrying on business in the name or style of
.....
.....
do hereby make entry of the house and premises situate at (3).....
..... in the county of .....
for the purpose of exercising and carrying on therein the business of a Bookmaker and do hereby further make entry of the undermentioned rooms and places now in the said house and premises to be used in connection with the said business for the purpose of making, receiving, or negotiating bets on credit, that is to say :—(4).....

4. Here describe the rooms and places intended to be used, and the marks or numbers by which they are distinguished.

For example—
On the ground floor on the left of the entrance from T—— Street, two rooms adjoining each other marked A and B respectively, and on the right of the entrance from T—— Street one room marked C. On the first floor one room marked D entered by the first door on the right in the passage from the top of the staircase, and one room marked E entered by the second door on the left of the passage

B.D. No. 2. Sec. 45354 1926

from the top of the staircase. (OR as the case may be.)

5. Day and month in words at length.

6. Signed or acknowledged by A—— B——, as the case may be.

Compared .....
Surveyor or Check Officer.

7. Officer to state if there is any internal communication with other premises and if he found the rooms as described or otherwise. If the description be insufficient he should add a brief description below.

Examined .....
Surveyor.

.....
.....
.....
.....

AS WITNESS my hand this (5) .....
day of .....192.....

RECEIVED by me, and (6).....
in my presence this.....day of
..... 192

.....*Officer.* .....*Station.*

(7) Visited and examined the rooms, &c, this..... day of .....

.....

.....*Officer.*

NOTES

1. This form, on completion, should be handed to the Officer, Customs and Excise .....
who will issue a Pay Notice enabling the Entry Certificate to be obtained from the Collector stated therein, on payment of the duty.

2. In view of the importance of completing the Entry Form properly it will save trouble and possible inconvenience to the bookmaker if the officer mentioned above is consulted before the form is filled up.

3. *No betting premises shall be used for the purpose of carrying on the business of a bookmaker which are used for any other trade, business or profession, or which have any internal communication with any other premises and entry cannot legally be made by more than one person or firm for any one set of premises.*

FORM B.D. No. 2A

Before filling in this form attention should be directed to the Notes on the back hereof

BETTING DUTY

ENTRY PAPER IN RESPECT OF A BUSINESS CARRIED ON BY A CORPORATION

1. Name of Company.

2. Address of the registered office of the Company.

3. Name in full of Chairman or Director or the Secretary or other Principal Officer of the Company who will sign the entry.

4. Chairman or one of the Directors or Secretary or Principal Officer as the case may be.

5. To be stated with sufficient fullness to ensure identification.

6. Here describe the rooms and places intended to be used and the marks or numbers by which they are distinguished.

For example—
On the ground floor on the left of the entrance from T—— Street, two rooms adjoining each other marked A and B respectively, and on the right of the entrance from T—— Street one room marked C. On the first floor one room marked D entered by the first door on the right in the passage from the top of the staircase, and one room marked E entered by the second door on the left of the passage from the top of the staircase. (OR as the case may be.)

7. Day and month in words at length.

We, (1) .....
a Company incorporated under "The Companies Acts" and having its registered office at (2).....
in the county of .....
(hereinafter called the Company) and (3).....
..... residing at
.....
..... in the county of .....
the (4)..... of the said Company do hereby make entry of the house and premises situate at (5).....
.....
in the county of .....
for the purpose of exercising and carrying on therein the business of a Bookmaker, and do hereby further make entry of the undermentioned rooms and places now in the said house and premises to be used in connection with the said business for the purpose of making, receiving or negotiating bets on credit, that is to say :—(6).....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
Dated this (7).....day of
.....192 . Passed
under the seal of the Company in the presence of
..... *Director.*
..... *Director.*
.....*Secretary.*
Signed by the said (3).....
in the presence of.....
.....

Seal of the Company

Received by me, this..... day of.....192 .

Compared .....
Surveyor or Check Officer

.....*Officer.* .....*Station.*

B.D. No. 2A. Sec. 45354 1926

8. Officer to state if there is any internal communication with other premises and if he found the rooms as described or otherwise. If the description be insufficient, he should add a brief description below.

(a) Visited and examined the rooms, &c., this ..... day of .....

.....*Officer.*

Examined .....
Surveyor.

NOTES

1. This form on completion should be handed to the Officer, Customs and Excise .....
who will issue a Pay Notice enabling the Entry Certificate to be obtained from the Collector stated therein, on payment of the duty.

2. In view of the importance of completing the Entry Form properly it will save trouble and possible inconvenience to the bookmaker if the officer mentioned above is consulted before the form is filled up.

3. *No betting premises shall be used for the purpose of carrying on the business of a bookmaker which are used for any other trade, business or profession, or which have any internal communication with any other premises and entry cannot legally be made by more than one person or firm for any one set of premises.*

FORM B.D. No. 8

CUSTOMS AND EXCISE—BETTING DUTY

POST ORDER FOR 3½% REVENUE TICKETS

To THE COLLECTOR,
BETTING DUTY BRANCH,
CUSTOM HOUSE,
LONDON, E.C.3.

Please despatch the undermentioned REVENUE TICKETS, for which I enclose remittance for the amount shown hereunder, to

Name and Address in full.....
(IN BLOCK LETTERS) .....

No. of Books required	Value of each Bet	No. of Tickets in Book	Cost of Book £	s	d	Total Cost £	s	d	For Official use only
	1/-	50		1	9				
	2/-	50		3	6				
	2/6	50		4	4½				
	3/-	50		5	3				
	4/-	50		7	—				
	5/-	50		8	9				
	10/-	50		17	6				
	£1	50	1	15	—				
	£2	50	3	10	—				
	£5	50	8	15	—				
					TOTAL £				

Date.....192 *Signature*.....

NOTES

(a) *A Money Order*, free of poundage, can be obtained at any Post Office in Great Britain which transacts Money Order business upon production of this form duly completed. The Money Order must be issued in favour of the Commissioners of Customs and Excise.

(b) *Bank Notes, Currency Notes or Coin* sent through the post should only be enclosed in one of the Registered Letter envelopes sold by the Post Office and the packet handed in at a Post Office for transmission.

(c) *Cheques* will only be accepted as cash in advance of clearance if they are guaranteed by the issuing Bank. A standing guarantee may be furnished, and a form of guarantee for the purpose will be sent if desired.

B.D. No. 8. Sec. 43384
1926

FORM B.D. 6, which corresponds to the above, is to be used where *personal* application is made.

FORM B.D. No. 9

CUSTOMS AND EXCISE—BETTING DUTY

POST ORDER FOR 2% REVENUE TICKETS

(*See next page for Notes*)

To THE COLLECTOR,
BETTING DUTY BRANCH,
CUSTOM HOUSE,
LONDON, E.C.3.

Please despatch the undermentioned REVENUE TICKETS, for which I enclose remittance for the amount shown hereunder, to

Name and Address in full.....
(IN BLOCK LETTERS).....

No. of Books required	Value of each Bet	No. of Tickets in Book	Cost of Book £	s	d	Total Cost £	s	d	For Official use only
	1/-	50		1	0				
	2/-	50		2	0				
	2/6	50		2	6				
	3/-	50		3	0				
	4/-	50		4	0				
	5/-	50		5	0				
	10/-	50		10	0				
	£1	50	1	0	0				
	£2	50	2	0	0				
	£5	50	5	0	0				
	TOTAL .. .. £								

Date.....192..... *Signature*.....

B.D. No. 9. Sec. 42385
1926

FORM B.D. 7, which corresponds to the above, is to be used where *personal* application is made.

NOTES

(*a*) *2 per cent. Revenue Tickets may be used only in the case of bets which fulfil all the following conditions, viz.:—*

(*i*) *the event must be a horse race;*

(*ii*) *the bet must be made on a ground used for the purpose of racing with horses, or any ground adjacent thereto;*

(*iii*) *the bet must be made on a day on which horse-racing takes place on such ground;*

(*iv*) *both the bookmaker accepting and the person making the bet must be in personal attendance at that ground.*

(*b*) *3½ per cent. Revenue Tickets must be used for all other bets. A special form of application (B.D. No. 8) is provided.*

(*c*) *A Money Order*, free of poundage, can be obtained at any Post Office in Great Britain which transacts Money Order business upon production of this form duly completed. The Money Order must be issued in favour of the Commissioners of Customs and Excise.

(*d*) *Bank Notes, Currency Notes or Coin* sent through the post should only be enclosed in one of the Registered Letter envelopes sold by the Post Office and the packet handed in at a Post Office for transmission.

(*e*) *Cheques* will only be accepted as cash in advance of clearance if they are guaranteed by the issuing Bank. A standing guarantee may be furnished, and a form of guarantee for the purpose will be sent if desired.

FORM B.D. No. 10

This Form, on completion, should be forwarded to the Commissioners of Customs and Excise, Custom House, London, E.C.3.

IMPORTANT.—It is illegal to dispense with the use of Revenue Tickets unless the Commissioners have signified their approval in writing of an arrangement for payment of Betting Duty on the basis of Returns.

BETTING DUTY

APPLICATION FOR THE APPROVAL OF AN ARRANGEMENT FOR PAYMENT OF BETTING DUTY OTHERWISE THAN BY THE USE OF REVENUE TICKETS

(*a*) State full and true name of applicant, and if a Firm or Partnership, its designation, and the full and true name and private address of each member. If a Limited Company, the name of the company and of its Secretary must be given.

(*b*) If a Limited Company, the application should be signed by a Director or by the Secretary, who should add his official designation; if a Firm or Partnership, the application should be signed by one or more members on behalf of the firm.

NOTE.—If a Limited Company the full name of the Directors should be furnished on a separate sheet, together with an extract from the Articles of Association relating to the affixing of the Company's seal.

(*c*) In the case of a Limited Company the registered address should be given.

I
—— (*a*)
We

hereby make application to the Commissioners of Customs and Excise for approval of an arrangement for the payment of Betting Duty otherwise than by the use of Revenue tickets

me
in respect of all bets to be made with —, and
us

undertake to furnish the Commissioners with full and true returns of all such bets made and to pay the proper duties thereon, to conform to the conditions attached hereto and to any other conditions which the Commissioners may from time to time make by way of amendment of or addition to the present conditions in the form of Statutory Regulations or otherwise, and to give security up to an amount and in a manner approved by the Commissioners including any further or better security which the Commissioners may consider to be necessary at any time during the continuance of the arrangement.

Witness..... *Signature* (*b*) .....

Address..... *Address* (*c*) .....

....

Description ..... *Date*.....

B.D. No. 10. Sec. 42246 1926

To be Filled in by Applicant

(1) Name or Style under which business is carried on. (If more than one name or style full particulars should be given.)

(2) Address of Betting Premises.

(3) If no Betting Premises are used, address at which books and accounts are available for inspection.

(4) The nature of the betting conducted, e.g. on Horseracing, Football, Whippet Racing, &c.

(5) Kind of Business:
(*a*) Office betting.
(*b*) Course betting.
1. Cash.
2. Credit.

(6) Do you propose to keep your weekly account of bets received (see Condition 3) by reference to each person or to each event?

(7) The maximum amount received in bets in any period of four consecutive weeks during the past year.

Amount £.....

Period from..... to

.....

(8) Average number of clients' accounts sent out weekly.

(9) Full name signature and description of the person who would be authorised to certify the returns furnished under the proposed arrangement, together with the full name, signature and description of a second person who would act in his absence.

(10) The name and address of the Guarantee Society, Bank, or individual* proposed as Surety to the Bond to be given for the security of the Duty and the observance of the Conditions attached hereto and any other conditions which may at any time be made.

* Where the amount of the bond is substantial and the surety is an individual a second surety may be required.

THE BETTING DUTY

CONDITIONS

OF THE APPROVAL BY THE COMMISSIONERS OF CUSTOMS AND EXCISE OF AN ARRANGEMENT FOR PAYMENT OF BETTING DUTY OTHERWISE THAN BY THE USE OF REVENUE TICKETS.

1. The bookmaker shall keep in a book in a manner satisfactory to the Commissioners a record of every bet received and shall, immediately any bet is made with him, enter in the appropriate record in such book :—

(*a*) The date when the bet was made ;

(*b*) The amount of the bet ;

(*c*) The conditions attaching to the bet ;

(*d*) In the case of a horse race the rate of duty to which the bet is liable ;

(*e*) Sufficient particulars to identify each bet.

2. Where the whole or any part of the liability in respect of a bet accepted by the bookmaker is transferred by him to another bookmaker by means of a fresh bet (hereinafter referred to as a "laid-off" bet) made with that other bookmaker, and it is intended to claim rebate of duty in respect thereof, such bet shall immediately be entered in the books of both bookmakers and clearly distinguished as a "laid-off" bet, and the name of the other bookmaker shown.

3. The bookmaker shall keep in a book an account in such form as the Commissioners may prescribe showing the total amount of bets made with him during each week ending Friday either by each person or in respect of each event.

4. A return certified by the bookmaker or by a person authorised by him to certify it shall be furnished weekly to the Collector of Customs and Excise designated by the Commissioners for the purpose, giving particulars of the amount of bets made in the week ending Friday in each week. The return shall be in such form as the Commissioners may prescribe and shall be forwarded not later than the Wednesday following the end of the week to which the return relates, together with a remittance for the aggregate amount of duty due. When no bet has been made with the bookmaker during any week, a nil return shall be furnished for that week, unless previous notice n writing has been given to the Commissioners.

5. The bookmaker shall give previous notice in writing of his intention to cease business temporarily for a period, specifying the date as from which business will cease. He shall also give previous notice in writing of the date of recommencing business.

6. The bookmaker shall immediately after taking any partner or partners in the proprietorship of the business or after there shall have been any change in the constitution of any firm concerned in such proprietorship or after there shall have been any assignment or agreement or death or other event in anywise affecting such proprietorship, give the Commissioners notice in writing thereof. A change in such proprietorship shall not of itself operate either to terminate the arrangement or to release from responsibility any person who shall have been the proprietor immediately before such change.

7. The arrangement for payment of duty by means of returns shall not be terminated by the bookmaker without the written consent of the Commissioners, but the Commissioners may at any time either on their own motion or on written application made by the bookmaker declare that the arrangement shall as from the date specified on that behalf in the declaration, cease to be in force and the arrangement shall thereupon cease to be in force accordingly, and any authority issued to the bookmaker for paying duty on returns shall forthwith be returned to the Commissioners.

8. No Revenue Ticket shall be used for the purpose of the Duty in respect of any bet made with the bookmaker.

CUSTOM HOUSE, LONDON, E.C.3.
September 1926.

FORM B.D. No. 11

CUSTOMS AND EXCISE—BETTING DUTY

WEEKLY RETURN

Bookmaker's Business Name .....

Address .....

.....

Address to which acknowledgment of remittance is to be sent .....

.....

RETURN of the total amount of Bets received in the week commencing the and ending on Friday, the , 192 , and the total duty thereon.

NOTE :
A Money Order free of poundage can be obtained at any Post Office in Great Britain which transacts Money Order business upon production of this form duly completed. The Money Order must be issued in favour of the Commissioners of Customs and Excise.

	Amount of Bets			Amount of Duty		
	£	s	d	£	s	d
Liable to Duty at 2%						
Liable to Duty at 3½%						
Total Duty ..				£		

I hereby certify that the foregoing is a full and true account of all bets received by or on behalf of the bookmaker named above during the period specified.

Signature of Authorised Person.....

Date.....192.....

To The Collector of Customs and Excise at

.....

NOTES

1. The return must include all bets received even though they are in whole or in part subsequently laid off with other bookmakers, and must also include any bets which are received from other bookmakers.

2. A "nil" return must be sent in all cases where no bets are received unless due notice has been given that the bookmaker has ceased to carry on the business for the time being.

3. Where a bet is made on any event and a condition is made that the whole or part of the winnings become stakes on another event or events, the amounts of the stakes placed on each other event must be treated as separate bets and included in the return.

4. Where a meeting or part of a meeting is abandoned, the bets received in respect of such meeting or part of a meeting need not be included in the return. Where duty has already been paid in respect of such bets repayment may be claimed.

5. Where bets are received on a non-starter, e.g. when a horse does not run, such bets need not be included in the return except in those cases where the amount is retained by or payable to the bookmaker as in the case of "all-in" bets. Where duty has already been paid in respect of bets on non-starters repayment may be claimed.

B.D. No. 11. Sec. 44172
1926

FORM B.D. No. 15

CUSTOMS AND EXCISE—BETTING DUTY

.....Collection. .....Station.

APPLICATION FOR REPAYMENT OF BETTING DUTY IN RESPECT OF LAID-OFF BETS

(1) Name in full.

(2) Address.

(3) "The Principal," "A Member," "A Director," "Manager" or "Secretary." Cancel "being.... of the firm of," if inapplicable.

(4) Title of firm or Company. In the case of a company delete the words "the firm of."

(5) Delete where inapplicable.

I, (1) .....
of (2) .....
being (3) .....
of the firm of (4) .....
Certificated Bookmaker of.....
hereby declare that the bets shown as "laid off" in the Schedule on the back of this form
me
were made by (5)—firm solely for the purpose
my
of transferring the liability in respect of bets
me
accepted by (5)—firm and on which betting
my me
duty has been paid by (5)—firm at the rate
my
specified.

I am
I claim that (5)———— entitled to re-
my firm is
payment of, and I hereby make application(5)
on their behalf, for the sum of £ : :
me
in respect of the betting duty paid by (5)——
my
firm on the original bets.

I attach..... Certificates by Bookmakers in support of my claim.

Dated this .....day of .....192 .

Signature.....

IMPORTANT NOTE.—Every claim for rebate of duty in respect of laid-off bets must be made on the approved form within three months of the date when the laid-off bet was made with the other bookmaker, and must be accompanied by a certificate from such other bookmaker acknowledging acceptance of the bet.

For Official use only

(6) To be filled in by the Officer who will insert the words "Signed in my presence" or "Signature acknowledged," as the case may be.

RECEIVED by me this.....day of .....192.....
(6).....
this ..... day of .....
.....192..... Officer of
..... Station.

I am satisfied that applicant is entitled to repayment of duty as claimed.
..... Officer of .....
..... Station.
.....*Date.*
Examined. .....*Surveyor.*
.....*Date.*

B.D. 15. Sec. 45471
1926

SCHEDULE OF LAID-OFF BETS

Meeting		Event	Horse, Competitor, etc.			Particulars of Laid-off Bets								Amount of Repayment		
Name	Date		Name	Total Amount of Bets received £	s	d	Rate of Duty Paid	Bookmaker with whom laid off Name	Address	Date of Bet	Amount of Bet £	s	d	£	s	d

FORM B.D. No. 16

CUSTOMS AND EXCISE—BETTING DUTY

FORM OF CERTIFICATE TO BE GIVEN BY BOOKMAKER ACCEPTING LAID-OFF BETS

I certify that the undermentioned bet(s) was/were made with me by ..... of .....

..... on the date(s) specified.

Betting Duty on such laid-off bet(s) has been or will be paid by me.

Meeting		Event	Name of Horse Competitor, etc.	Date of Bet	No. of Revenue Ticket (if any)	Amount of Bet		
Name	Date					£	s	d
					TOTAL £			

Signature.....
Certified Bookmaker.

Address .....

Date.....192.....

B.D. 16. Sec. 45471 1926

FORM B.D. No. 22

CUSTOMS AND EXCISE—BETTING DUTY

.....Collection.

.....Station.

APPLICATION FOR REPAYMENT IN RESPECT OF DUTY ON VOID BETS

(1) Name in full.

(2) Address.

(3) "The Principal," "A Member," "A Director," "Manager" or "Secretary." Cancel "being of the firm of" if inapplicable.

(4) Title of firm or company. In the case of a company delete the words "the firm of."

(5) Delete where inapplicable.

I (1).....
of (2).....
being (3).....
of the firm of (4).....
Certificated Bookmaker of.....
hereby declare that the bets shown as "void" in the schedule on the back of this form were made with (5) me/my firm ——— and that duty has been paid thereon at the rate shown. I declare further that these bets have become void for the reasons stated in the said schedule; that no money has been retained by or will be paid to or by (5) me/my firm ——— in respect of such bets and that no other claim has been or will be made by (5) me/my firm ——— for repayment of duty on such bets.

I hereby make application (5) on their behalf for repayment of the sum of £ : : in respect of the betting duty paid by (5) me/my firm ——— in respect of the aforesaid void bets.

Dated this.....day of.....192

(*Signature*) .....

For Official Use Only

Received by me this ..... day of ..... 192 .

(6) .....

(6) To be filled in by the Officer, who will insert the words "signed in my presence" or "signature acknowledged" as the case may be.

this .....day of 192

..... *Collector Officer.* ..... *Collection Station.*

I am satisfied that applicant is entitled to repayment of duty as claimed.

..... Officer of .....
Station.

.....*Date.*

Examined..... *Surveyor.*

.....*Date.*

B.D. No. 22 Sec. 66500 1926

SCHEDULE OF VOID BETS

Meeting		Particulars of Bet				Backer		No. of Revenue Ticket used (if any)	Reason why Bet is Void	Amount of Repayment Claimed		
Name	Date	Event	Horse, Competitor, etc.	Amount £	Amount s	Amount d	Date when made	Duty paid	Name	Address				
											£	s	d

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